

 CAPILANO UNIVERSITY		PROCEDURE	
Procedure No.		Procedure Name	
B.217.1		Fraud Reporting and Investigation	
Policy This Procedure is Under		Officer Responsible	
B.217 Fraud Policy		Vice-President, Finance and Administration	
Approved by	Replaces	Category	Next Review
SLC	New		June 2028
Date Issued	Date Revised	Related Policies	
June 2023		B.310 Protected Disclosure (Whistleblower)	

1 PURPOSE

- 1.1 This procedure supports B.217 Fraud Prevention and Investigation Policy and communicates the process that should be followed by a member of the University community who has a good faith concern regarding suspected fraud.

2 REPORTING SUSPECTED FRAUD

- 2.1 Employees should report to the Administrator responsible for their academic or administrative area. The Administrator should immediately direct the report to the Vice President, Finance and Administration. If for any reason, the employee is uncomfortable reporting their concerns to the Administrator they may report directly to the Vice President Finance and Administration
- 2.2 Other Members of the University Community should report directly to the Vice President, Finance and Administration.
- 2.3 If the suspected Fraud relates to the Vice President Finance and Administration the report should be made to the President, or the Chair of the Audit and Risk Committee in line with B.310 Protected Disclosure (Whistleblower) Policy
- 2.4 In order for the Vice-President, Finance and Administration to consider and identify the appropriate course of action, the reporting individual should provide the following information, to the extent of their knowledge:
- a. details of such alleged fraud being reported and the suspected parties involved;
 - b. any University policies or procedures, or applicable laws, alleged to have been breached by the alleged fraud; and
 - c. any other relevant information.

2.5 All concerns disclosed in accordance with these procedures will be seriously considered in an objective, timely, and fair manner, respecting the rights of individuals in accordance with these procedures.

3 INVESTIGATIONS

3.1 The Vice-President, Finance and Administration will evaluate the details of a report of alleged Fraud, including where necessary gathering further information, and determine

- a) whether the allegation of fraud is clearly false, unfounded, frivolous, vexatious, or disclosed in bad faith; or
- b) that further investigation is needed and in addition whether immediate steps to address the Fraud, implement controls and contain further risks are required.

3.2 If the Vice-President, Finance and Administration deems further investigation is required, they will determine dependent on the circumstances, whether the report should be investigated by:

- a) the police or appropriate authorities;
- b) the external auditor;
- c) an independent investigator;
- d) a designated director or manager; or
- e) the Board of Governors

3.3 The Vice President, Finance and Administration, will engage all necessary and appropriate internal and/or external resources and advisors as deemed necessary to form a team to investigate the potential Fraud incident carefully and fairly, respecting privacy and confidentiality as appropriate.

3.4 The investigative team will work with the relevant department/faculty resources to complete:

- a) A thorough summary of the instance, the impact to the University, mitigation actions taken and resulting status.
- b) An assessment of existing operational risk management practices and identification of internal control improvements required.
- c) The status of internal control improvement efforts.
- d) Additional information that may be required as determined by the Vice President, Finance and Administration

3.5 The Directors of Finance and Risk Management will support the investigation and work closely with the affected area to ensure that appropriate risk mitigations strategies and internal controls are put in place to address the incident and provide updates regarding the incident and the mitigating actions being taken to the are communicated expeditiously to the Vice President, Finance and Administration.

- 3.6 The Vice President, Finance and Administration will make sure that the Office of the President, members of the Executive, and other Members of the University Community are kept updated as relevant information becomes available.
- 3.7 If the Vice-President, Finance and Administration deems any allegation of fraud to be false, unfounded, frivolous, vexation, or disclosed in bad faith, the Vice-President, Finance and Administration will determine whether to dismiss the allegation, and together with the Vice President People, Culture and Diversity whether action should be taken against the reporting individual.
- 3.8 Within a reasonable amount of time following completion of an investigation or audit, the Vice-President, Finance and Administration will make sure that the Audit Committee is informed of the alleged fraud, the steps taken to investigate the alleged fraud, the outcome of the investigation and the actions taken in response.

4 DESIGNATED OFFICER

Directors of Finance and Risk Management are responsible for the development, subsequent revisions to and operationalization of this procedure under the oversight of the Vice President, Finance and Administration.