



## Fraud Control – Policy

The SpringDale Neighbourhood Centre Inc needs to oversee its operations and provide a framework for establishing a culture where fraud, corrupt or improper conduct is not tolerated.

The following guidelines are for dealing with suspected fraud, corrupt or improper conduct of members of the SpringDale Committee, employees, tutors, volunteers, participants, contractors or visitors to the Centre.

### For the purposes of this policy, fraud is:

- Dishonest activity causing actual or potential financial loss to any person or to the Centre, including theft of moneys or other property, and whether or not deception is used at the time, immediately before or immediately following the activity.
- This also includes the deliberate falsification, concealment, destruction or use of falsified documentation used or intended for use for a normal business purpose or the improper use of information or of a position.

### Corrupt conduct is:

- Conduct of any person that adversely affects the honest performance of the functions of the Centre.
- The performance of a person's functions either dishonestly or with inappropriate partiality;
- Conduct that amounts to a breach of public trust;
- Conduct that amounts to the misuse of information or material acquired in the course of the performance of a person's official functions; or
- A conspiracy or attempt to engage in the above conduct.

**Improper conduct means** conduct that is corrupt, a substantial mismanagement of public resources, or conduct involving substantial risk to public health or safety or to the environment. The conduct must be serious enough to constitute, if proved, a criminal offence or reasonable grounds for dismissal.

### Centre Culture:

Everyone is expected to abide by the policies and processes of the Centre.

***SpringDale Neighbourhood Centre Inc will not, under any circumstances, tolerate any instance of fraud, corrupt or improper conduct.***

### Control Processes

- The Centre Coordinator is responsible for managing fraud and corruption control
- All people have a responsibility to report any suspected instance of fraud, corrupt or improper conduct to the Coordinator. If the person has reason to believe that the Coordinator may be involved they should immediately notify the President of the SpringDale Committee. No discussion should occur in relation to the matter with

anyone other than the Coordinator or the President and the Police as the case may be.

- Once a suspected fraud is reported the Coordinator / President and / or Police as applicable, must take immediate action to investigate the matter and, where relevant, to prevent the theft alteration or destruction of relevant records including removing the records and placing them in a secure location, limiting access to the location where the records are kept, and preventing the suspect individual accessing the records.
- Where the outcome of an informal investigation concludes that, in all likelihood, fraud or corrupt conduct has occurred the matter will be referred to the SpringDale Committee and the Police. The person or persons involved will be suspended from duties until such time as formal investigations by an appropriate authority have been made and the Police and the insurers notified.

### **Monitoring and Review Mechanisms**

- Fraud, corrupt and improper conduct prevention mechanisms will be monitored and reviewed regularly through internal quality system reviews and/or Audit.
- These reviews will, as a minimum, include review of purchasing, accounts payable, receipting and banking, and employment of staff and consultants.