

Fraud Policy

Ensure that all parties are aware of their responsibilities regarding the identification and prevention of fraudulent activity.

Purpose:

Ensure that staff / volunteers / contractors / suppliers / Board members understand who to report suspected fraudulent activity to.

Express a clear statement to staff / volunteers / contractors / suppliers forbidding fraudulent activity.

Scope:

All KVS Staff, board members, volunteers, suppliers and contractors.

Implemented by:

Principal

Approved by:

KVS Board

Reviewed:

Every three years, as legislative changes arise or improvements are identified

Communicated via:

Staff Meetings, Website, Staff Handbook

Overview

Koonwarra Village School will not tolerate fraud in any aspect of its operations.

Koonwarra Village School will take action on any suspected acts of fraud, misappropriation or other similar irregularities. An objective and impartial review of the suspected fraud will be conducted regardless of the position, title, length of service or relationship with the school of any party who might be the subject of such investigation.

Any fraud shall constitute grounds for dismissal. Any serious case of fraud, whether suspected or proven, shall be reported to the relevant and appropriate authorities such as the police or the Victorian Registration and Qualifications Authority.

Any person who suspects the commission of a fraud, related to the operations of Koonwarra Village School, is required to immediately report it to the Principal / appropriate person in authority within Koonwarra Village School. Any person reporting a fraud, or a suspected fraud, shall not be penalised for raising a concern of this nature.

Definition

Fraud - To dishonestly obtain or arrange a benefit or advantage by deception or other means. Examples include:

- Theft such as stealing property, funds or petty cash;
- Falsification of records, accounts or documents to deceive;
- Dishonestly destroying or concealing accounts or records;
- Embezzlement or misappropriation of funding or other assets;
- Misuse of assets or property for personal benefit (e.g. vehicles); and
- Forgery or issuing false or misleading statements with intent to obtain financial advantage or deceive.

Responsibilities

The **KVS School Board** has ultimate responsibility for the prevention and detection of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place.

The **Principal** is responsible for implementing the internal control systems nominated by the Board and for taking action when instances of fraud are reported to them. The Principal must also educate staff / volunteers / contractors about fraud prevention and detection; and

All **staff/volunteers/contractors** share in the capacity to the prevent and detect of fraud.

Reporting

All staff / volunteers / contractors / Board members have the responsibility to report suspected fraud.

Any staff member, volunteer or contractor who suspects fraudulent activity must immediately notify the Principal about the concern.

In situations where the suspected fraud involves the Principal, the staff member, volunteer or contractor must then notify the Chairperson of the Board.

Process

The School will take action on all cases of suspected fraud as soon as is practicable. The nature and timing of the investigation will depend on the concern or allegation that has been made.

The Principal or Board will appoint an independent investigator or an investigation team, which may be internal or external to the school depending on the nature of the activity, but who must have no conflict of interest or involvement in the disclosure. The investigator will seek further information and evidence from all relevant parties either in writing or in person, seek information and evidence from other sources as appropriate, seek advice from external professionals, refer the matter to regulators or other authorities, if necessary, draft a report to summarise their findings, and make recommendations for action.

The investigation report and recommendations will be tabled for the Principal and the Board unless they are the subject of the allegations.

Next Steps

If an allegation of fraud is substantiated by the investigation, disciplinary action, up to and including dismissal (or termination of an individual's right to work as a contractor or volunteer), shall be taken by the Principal.

The school will also pursue every reasonable effort, including court ordered restitution, to obtain recovery of any losses from the offender.

Where a case of fraud has been established, the matter shall be referred to the relevant authorities.

If an allegation is made in good faith, but it is not substantiated by the investigation, no action will be taken against the complainant.

The school will make every effort to keep the investigation confidential; however, other individuals may need to be consulted to assist with a review / investigation.

Related Documentation and Policies

- Staff Code of Conduct
- Staff Handbook
- Employee contracts
- Whistleblower Policy