

## Fraud and Irregularity Policy

### Overview

The **Alberta Post-Secondary Application System (APAS)** is committed to the highest standards of ethical conduct and fiduciary responsibility and therefore treats matters of **fraud** and **irregularity** with the utmost seriousness.

### Purpose

The purpose of this policy is to clearly state that APAS, its Board of Directors, and management will not condone either acts of fraud or irregularities.

### POLICY

#### 1. GENERAL

Employees who commit an act of fraud or irregularity will be subject to disciplinary action up to and including termination of employment and prosecution, if appropriate. Fraud, including fraud that benefits APAS, will not be tolerated.

#### 2. RESPONSIBILITIES

All staff members have an obligation to report suspected fraud or irregularity to their immediate supervisor or the Executive Director. If the complaint is against the Executive Director, the report should be made to the Chair of the Board of Directors.

The Executive Director or the Chair of the Board of Directors will ensure that any reported or observed instance of fraud or irregularity is investigated in a timely manner.

#### 3. INVESTIGATION

If the complaint is in regards to a staff member:

The Executive Director, with the support of legal counsel if required, will determine if the report has merit. If merit in the complaint is found, the Executive Director will convene a committee composed of the Executive Director, the Chair of the Board of Directors and the Chair of the Finance Committee to investigate.

If the complaint is in regards to the Executive Director:

The Chair of the Board of Directors, with the support of legal counsel if required, will determine if the report has merit. If merit in the complaint is found, the Chair of the Board of Directors, the Vice-Chair of the Board of Directors, and the Chair of the Finance Committee will investigate.

In either of these cases legal counsel may be requested.

#### 4. RESOLUTION

As a result of the investigation the Committee can recommend no further action, disciplinary action, dismissal and / or legal action. The Society, to the extent reasonably possible, will recover any losses incurred through financial improprieties

**DEFINITIONS**

<b>Fraud</b>	<p>A deliberate and/or unlawful deception, misrepresentation or concealment of facts practised to secure advantage, benefit or gain and/or to cause loss to another.</p> <p>Examples of fraud for the purposes of this policy include:</p> <ul style="list-style-type: none"> <li>- Misrepresentation of material facts</li> <li>- Concealment of material facts</li> <li>- Bribery</li> <li>- Undeclared conflict of interest</li> <li>- Theft of money or property</li> <li>- Theft of intellectual property</li> <li>- Theft of identity</li> <li>- Breach of fiduciary duty</li> <li>- Statutory offences</li> </ul>
<b>Irregularity</b>	<p>An activity or potential activity that deliberately disregards the Society's regulations or procedures (such as the <i>Conflict of Interest Policy</i>).</p> <p>Includes concerns regarding questionable accounting or auditing matters within the Society.</p> <p>The scope of this policy is limited to activities related to, or funds or property owned by, or in the care of APAS.</p>