

NORTHWEST FLORIDA STATE COLLEGE
Board Policy 6Hx17-4.02

TITLE:	FRAUD AND THEFT POLICY
REFERENCE:	
HISTORY:	New Policy, June, 2006 Local Language,6/06

Local Language

Policy

Fraudulent and dishonest behaviors are NOT tolerated. The College promotes an organizational environment and culture that requires honesty and ethical behavior and encourages the prevention of fraud and theft by raising awareness of the need for high standards of personal and professional conduct. It is the policy of the college to identify and promptly investigate any possibility of fraudulent or related dishonest activities against the college and, when appropriate, to pursue legal remedies available under the law.

As provided in the Employee Handbook, any act of fraud, theft, illegal acts or misconduct ascertained upon investigation, or pursuant to a criminal conviction, or through written acknowledgment by the employee(s) concerned, shall result in the appropriate disciplinary and legal actions against the employee(s) and/or entities, to include the possibility of termination of employment, restitution and/or forwarding information to the appropriate authorities for criminal prosecution. The repayment of losses will be sought in all cases and the College will normally expect to recover all costs in addition to the recovery of losses.

Purpose:

Northwest Florida State College is and wishes to be seen by all as being honest and opposed to fraud in the way it conducts its business. The College's ethical behavior and fraud reporting administrative procedure addresses the responsibility of employees and management for the detecting and reporting of fraud or suspected fraud.

Definitions

For the purposes of this policy, fraud and or theft shall include but not be limited to:

- Theft or misappropriation of College assets

- Submitting false claims for payments or reimbursement
- Accepting or offering a bribe or accepting gifts or personal favors under circumstances that might lead to the inference that the gift or favor was intended to influence an employee's decision-making while serving the College
- Accepting a commission (kick back) from or paying same to a third party in exchange for a college service
- Black-mail or extortion
- 'Off Books' accounting or making false or fictitious entries
- Knowingly creating and/or distributing false or misleading financial reports
- Paying excessive prices or fees where justification thereof is not documented
- Violation of the College's procedures with the aim of personal gain or with resulting detriment to the College
- Willful and /or negligent acts that cause damage to the material interest of the College
- A dishonorable or irresponsible or deliberate act against the interests of the College

For the purpose of this policy, an employee refers to all those representing or working on behalf of the college to include but not limited to those receiving a check through the college payroll system. The administration, faculty, and staff members who receive remuneration, either full or part time from the College; further, employee also includes any volunteer or organization that provides services on behalf of the College through an official arrangement with the College or a College organization, college work-study students, Americorp Members, and other individuals associated with the college.

Responsibility for the Detection and Prevention of Fraud and Theft

Employees at all levels are responsible for exercising due diligence and control to prevent, detect and report acts of fraud. Those who fail to carry out these responsibilities will be subject to disciplinary action up to and including termination of employment.

Responsibility of Management

It is the responsibility of the administration to be familiar with the types of improprieties that might occur in their area and be alert for any indication that improper activity, misappropriation or dishonest activity is or was in existence and put in place controls to avoid such occurrences.

Administrators are required to support and work with the College President to assist other involved departments and law enforcement agencies in the detection, reporting and investigation of dishonest or fraudulent activity including the prosecution of offenders. If a fraud or theft is detected in an area, the administrator or manager is responsible for taking appropriate corrective actions to ensure adequate controls exist to prevent reoccurrence of improper actions.

Responsibility of Employees

It is the responsibility of all employees to conduct their College business in such a way as to prevent the occurrence of fraud and theft in the workplace. Employees must also be alert to the possibilities for fraud and theft and be on guard for any indications that improper or dishonest activity is taking place and to report fraud or theft when they think it has occurred.

Reporting Fraud

College employees should report any suspicions of fraud or theft, without delay, according to the procedure described in Appendix S. Reporting anonymously is also encouraged but requires sufficient details of the alleged wrongdoing to allow for an investigation. Persons who cover up, obstruct, or fail to report fraud/theft, may be considered to be complicit and may be subject to disciplinary action and/or discharge. Persons who threaten retaliation against a person reporting a suspected fraud shall be subject to disciplinary action up to and including termination of employment.

Great care must be taken in dealing with suspected dishonest or fraudulent activities to avoid:

- Incorrect allegations or false reports
- Alerting suspected individuals to an investigation underway
- Treating employees unfairly

In the case of all employees and management, the incident, facts, suspicions or allegations should not be discussed with anyone inside or outside the College unless specifically directed to do so by the college president's designee investigating the incident. In particular, the matter should not be discussed with the individual suspected of fraud.

See Appendix S for Procedures