



Fraud, Theft and Corruption

Purpose:

Caledon Community Services (CCS) is committed to fostering integrity in our workplace and is opposed to all forms of theft, fraud, and corruption. CCS staff, volunteers, program/student placements occupy a special position of trust with CCS clients, our community and our peers. It is essential that trust be maintained and that complete confidence exists in these relationships.

Policy:

This policy is to provide direction to CCS staff, volunteers, program/student placements on CCS' stance on fraud, theft and corruption and applies to any matter where indications of noncompliant activities are present.

DEFINITIONS:

Fraud: For the purpose of this policy, fraud is defined as including events or situations in which the existence of 1) deception, 2) loss / benefit, and 3) victim(s) have all been established and proven. (Criminal Code of Canada)

Theft: For the purpose of this policy, theft is defined as including the acts of stealing, taking or removing corporate or personal property, including intellectual property, monetary or other physical goods, without appropriate authorization. (Criminal Code of Canada)

Corruption: For the purpose of this policy, corruption is defined as the offering, giving, soliciting or acceptance of an improper inducement or reward, which may influence the decision, decision-making process, or action of any person.

Procedures:

CCS expects its staff, volunteers, program/student placements to act honestly, with integrity, in good faith, and to safeguard the CCS' resources for which they are responsible.

CCS is committed to minimizing opportunities for theft, fraud and corruption and has established internal controls and processes that are intended to prevent or detect improper activities. Unfortunately, even the best systems and controls cannot provide absolute safeguards.

CCS expects all staff, volunteers, program/student placements to report irregularities re: fraud, theft, corruption using the Incident Investigation form.

Any suspected or known case of theft, fraud, corruption, or non-compliant activity will be investigated and dealt with appropriately as per CCS' Reporting Ethical Codes of Conduct Violations policy.

Fraud, (attempted) theft or corruption by staff, volunteers, program/student placement may result in the immediate dismissal and he/she may be reported to the local police authority. If a staff, volunteer, program/student placement is suspected of stealing, he/she may result in suspension pending further investigation.

Reports must be made in good faith and based on reasonable grounds. An individual who intentionally makes a false, bad faith or malicious report shall be subject to disciplinary or administrative measures up to and including termination of employment or contractual relationships. CCS stakeholders are to refer to CCS' Whistleblowing Protection Policy.

REFERENCES

Ethical Code of Conduct

Whistleblowing Protection Policy

Reporting Ethical Codes of Conduct Violations policy

Internal Controls Procedures

Date Developed: October 2015

Date Approved: January 2016