

Requirements

SENIOR MANAGEMENT AND STAFF RESPONSIBILITIES

Senior Management is responsible for instituting and maintaining a system of financial control to provide reasonable assurance for the prevention and detection of fraud.

Fraud awareness training shall be provided to all permanent employees and trustees at least once every 24 months of initial hire and biennially thereafter.

All permanent employees shall receive information and training on Policy VI-24, Fraud Management, and the accompanying Procedure VI-24 during new hire orientation activities.

All employees and trustees shall be required to make an annual declaration with respect to Policy I-24, Fraud Management as per Procedure VI-24.

NOTIFICATION OF SUSPICION OF FRAUD

In accordance with Policy I-24, Fraud Management, any employee that is detected or suspected must be reported immediately.

Any employee who has knowledge of a suspected fraud shall report the matter to their manager/supervisor. If the employee has reason to believe that their manager/supervisor has knowledge of a suspected fraud, the employee shall notify their Superintendent. If the employee has reason to believe that their Superintendent

Superintendent of Business Services has knowledge of a suspected fraud, the employee shall immediately notify their Superintendent.

The employee shall not discuss the matter with anyone other than those individuals who are notified in accordance with the reporting process. If the employee has knowledge of a suspected fraud, the employee shall immediately notify the Superintendent of Business Services.

The Superintendent shall not attempt to investigate the suspected fraud or to discuss the matter with anyone other than those individuals who are notified in accordance with the reporting process.

Upon notification of a suspected fraud of a material amount, the Director of Education and the Superintendent of Business Services shall inform the Chair of the Audit Committee of all fraud suspected fraud and shall ensure that all instances of all fraud suspected fraud are appropriately investigated.

The Director of Education and the Superintendent of Business Services may, at their discretion, involve the services of the Regional Internal Audit Manager, the HCDSB forensic consultants, and/or HCDSB legal counsel.

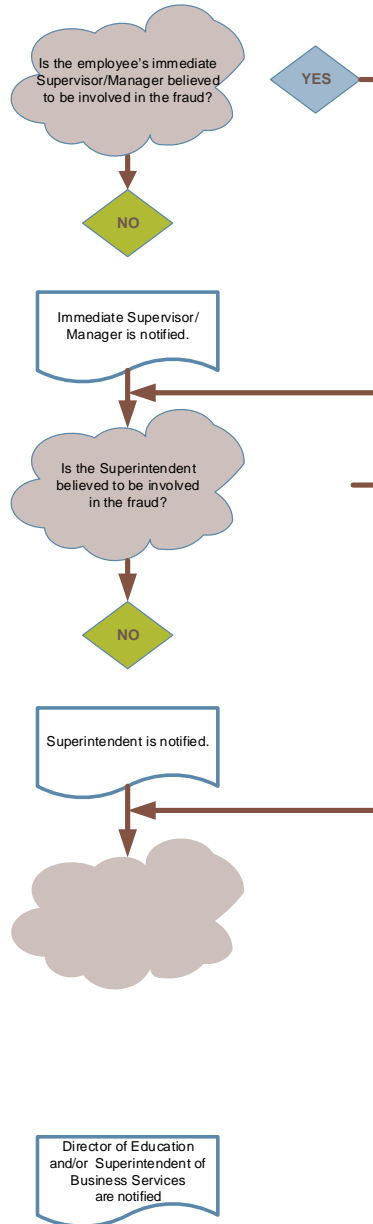
SECURITY OF EVIDENCE



Procedure No. VI



Fraud Management Notification Process



Appendix "C"

~~Excerpt from:~~ Regulation 361/10

~~Credit Co-ops and Regulation (361/10) to the Enforcement Act for Credit Co-ops (C) which states that (emphasis added):~~

~~"~~

- ~~1. To initiate and oversee investigations into auditing matters, internal financial controls, and allegations of inappropriate or illegal financial dealing, including the adequacy of insurance those risks.~~
- ~~2. To perform other activities ~~in the promotion of the business of the credit co-ops and to~~~~
- ~~3. To initiate and oversee investigations into auditing matters, internal financial controls, and allegations of inappropriate or illegal financial dealing.~~