



## **Policy Against Fraud**

Virginia Wesleyan College is committed to the highest standards of moral and ethical behavior. These standards, and the subject of appropriate behavior, are outlined in the *Student Handbook*, *The Staff Policy and Procedure Manual*, and *the Faculty Handbook* and should be observed by all students, faculty, and staff.

The purpose of this policy is to specifically address fraudulent acts. Fraudulent activity of any kind, including for the benefit of Virginia Wesleyan College, is expressly forbidden. Fraud generally involves a willful or deliberate act with the intention of obtaining an unauthorized benefit, such as money or property, by deception or other unethical means. All fraudulent acts are included under this policy and include, but are not limited to, such things as:

- Embezzlement, misappropriation or other financial irregularities
- Forgery or alteration of documents (checks, time sheets, contractor agreements, purchase orders, other financial documents, electronic files)
- Improprieties in the handling or reporting of money or financial transactions
- Misappropriation of funds, securities, supplies, inventory, or any other asset (including furniture, fixtures, or equipment)
- Authorizing or receiving payment for goods not received or services not performed
- Authorizing or receiving payments for hours not worked
- Misapplication, destruction, removal, or concealment of property
- False claims by students, employees, vendors, or others associated with Virginia Wesleyan College
- Theft of any asset including, but not limited to, money and tangible property
- Inappropriate use of computer systems, including hacking and software piracy
- Bribery, rebate, or kickback
- Intentional misrepresentation of facts

While a fraudulent act may have criminal and/or civil law consequences, Virginia Wesleyan College is not required to use a determination by a criminal justice authority to criminally prosecute as the basis for determining whether an act is fraudulent. It is the internal determination that the above criteria are present that defines an act as fraudulent under this Policy.

Generally, faculty, staff, students, and other persons associated with Virginia Wesleyan abide by laws, rules, regulations, and policies; however, incidents of fraud may occur. Vice presidents, and all levels of management, are responsible for establishing and maintaining proper internal controls that provide security and accountability for the resources entrusted to them. Management personnel should be familiar with the risks and exposures inherent in their areas of responsibility and be alert for any indication of improper activities, misappropriation, or dishonest activity.

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Any member of the campus community who has a reasonable basis for believing a fraudulent act has occurred, has a responsibility to promptly notify his or her supervisor, the appropriate Vice President or, if appropriate, the Director of Security. Employees who, in good faith, report suspected fraudulent activity are protected against retaliation by Virginia Wesleyan College for making such a report. The reporting member of the campus community shall refrain from confrontation of the suspect, further examination of the incident, or further discussion of the incident with anyone other than the employee's or student's supervisor or others involved in the resulting review or investigation. Anyone found to be making an intentional or misleading claim under this Policy will be disciplined, up to and including termination of employment or expulsion from the College.

Great care is to be taken in dealing with suspected fraudulent activities to avoid any incorrect accusations, alerting suspected individuals that an investigation is under way, violating anyone's right to due process, or making statements that could lead to claims of false accusation or other civil rights violation(s).

Anyone found to have participated in fraudulent acts as defined by this policy will be subject to disciplinary action, up to and including termination. Additionally, employees suspected of perpetrating fraudulent acts may be suspended during the course of the investigation. In those cases where disciplinary action is warranted, the Director of Human Resources shall be consulted prior to taking such action. Criminal or civil actions against employees who participate in unlawful acts will be forwarded to the appropriate agency. The employment of any employee involved in the perpetration of fraud will ordinarily be terminated.

Students found to have participated in fraudulent acts as defined by this policy will be subject to disciplinary action pursuant to the *code of Student conduct* and/or *the Student Handbook*. In those cases where disciplinary action is warranted, the Vice President for Student Affairs and/or legal counsel shall be consulted prior to taking such action. Additionally, criminal or civil actions against students who participate in unlawful acts will be forwarded to the appropriate agency.

The relationship of other individuals or entities associated with Virginia Wesleyan College found to have participated in fraudulent acts as defined by this policy will be subject to review, with possible consequences including termination of the relationship. In those cases where action is warranted, legal counsel shall be consulted prior to taking such action. Additionally, criminal or civil actions against individuals or entities associated with Virginia Wesleyan who participate in unlawful acts will be forwarded to the appropriate agency.