Thames Valley District School Board

Fraud Prevention and Management Policy

1. Intent

1.1. It is the policy of the Thames Valley District School Board (TVDSB) to support a system strategy for fostering and maintaining a work environment of financial integrity, and requires all departments and schools to maintain an environment that is free of Fraud.

2. Definitions

2.1. **Anonymous Reporting Tool** refers to an online or phone-based service where TVDSB employees can report alleged Fraud, as outlined in TVDSB Anonymous Reporting Procedure (NEW).

2.2. **Anonymous Reporting Tool Provider** refers to the third-party vendor contracted by TVDSB to provide an Anonymous Reporting Tool to report alleged Fraud and ensure the notification of reports received are sent to the appropriate individual(s).

2.3. **Audit Committee** refers to the members of the Board of Trustees/Supervisor and the community members who comprise the TVDSB Audit Committee.

2.4. **Claimant** refers to any TVDSB employee, volunteer or Trustee/Supervisor who reports or corroborates a detected Fraud or alleged Fraud. This includes the previously used term of whistleblower.

2.5. **Direct Reporting of Fraud (Internal Reporting)** or **Directly Reported** refers to an individual reporting an alleged Fraud directly to TVDSB Administration.

2.6. **External Parties** refers to an external practitioner(s) that will review reports received and assess their validity.

2.7. **Fraud** refers to wrongful or criminal deception committed by an individual with the intent of obtaining financial or personal gain, which includes, but is not exclusive to, the following actions:

2.7.1. The theft or unauthorized use of a TVDSB asset (e.g. cash, financial funds, furniture, computers and related peripherals, smart phones, vehicles, machinery, tools, etc.) Note: In certain circumstances, use of TVDSB assets can be authorized by the direct supervisor of the TVDSB employee on a case-by-case basis or through blanket permission;

2.7.2. The inflation or non-work-related claim of expenses in contravention of the Expense Reimbursement Policies (1005 and 2003) and Procedures (1005a and 2003a);

2.7.3. The knowing misrepresentation of financial information through the alteration, forgery, or unauthorized destruction of electronic or manual data and/or documentation of a financial nature;

2.7.4. Invalid claims for paid leaves of absence, false time reporting and falsification of benefit claims;

2.7.5. Providing preferential treatment in the selection and/or engaging in business with vendors in contravention of the Purchasing Policy (1001) and Procedure (1001a), such as acceptance of bribes and gifts; and

2.7.6. Misuse or abuse of authority to influence the actions of another in relation to 2.6.1 through 2.6.5.

2.8. **Internal Controls** refer to the processes and mechanisms implemented by TVDSB to prevent, mitigate, and detect errors, and/or Fraud.

2.9. **Fraud Report Assessment Team** refers to the group of TVDSB personnel, and/or External Parties, responsible for assessing if a Fraud has occurred, beginning with a Fraud report. This team is tasked with determining the validity of the reported Fraud through a systematic and thorough process.

2.10. **TVDSB Administration** refers to TVDSB employees in administrative roles such as Principal, Supervisor, Manager, Executive Officer, Supervisory Officer or Director of Education.

2.11. **TVDSB Senior Administration** refers to TVDSB employees holding the position of Executive Officer, Supervisory Officer or Director of Education.

3. Objective of Policy

3.1. This Policy establishes a framework for detecting, preventing, and responding to fraudulent activities within the TVDSB in a fair and timely manner.

3.2. This Policy aims to safeguard the integrity of the TVDSB's operations, ensure the responsible use of resources, and maintain public trust.

3.3. The Policy will strive to ensure that all action taken to assess a report's validity are free of bias.

4. Roles and Responsibilities

4.1. This Policy and corresponding Procedure apply to all TVDSB employees, volunteers and Trustees/Supervisor.

4.1.1. All TVDSB employees, volunteers and Trustees/the Supervisor shall fully cooperate with efforts to assess a report's validity by the Fraud Report Assessment Team pursuant to this Policy and Procedure.

4.2. The **Audit Committee** is responsible for receiving reports of alleged Fraud related to the Director of Education and/or Trustees/Supervisor from the External Parties. It also authorizes assessments to determine the validity of these reports in certain circumstances, reviews the outcomes of those assessments, and ensures that Internal Controls have been evaluated and amended as necessary.

4.3. **The Business Services Department** is responsible for establishing, maintaining, and monitoring the Anonymous Reporting Tool.

4.4. The **Anonymous Reporting Tool Provider** is responsible for providing digital and anonymous methods for reporting alleged Fraud, documenting these reports, and making the information available to the appropriate individual to assess the reports for validity.

4.5. **Business Services and Financial Services** are responsible for assessing the validity, where appropriate, reports of alleged Fraud which are Directly Reported or submitted through the Anonymous Reporting Tool, where the reports do not involve the Director of Education and/or a Trustee(s)/Supervisor. Additional departments may be needed at the request of the above-listed departments.

4.6. **External Parties** are responsible for initially receiving reports of alleged Fraud and assessing the validity of those reports concerning the Director of Education and/or a Trustee(s)/Supervisor.

4.7. The **Director of Education** shall be responsible for determining the most appropriate spokesperson for media inquiries related to alleged or substantiated Fraud.

4.8. The **Director of Education**, through the **Business Services Department**, is authorized to issue operational processes and guidelines to implement this Policy and related Procedures consistent with legislation or regulations.

5. Fraud Assessment and Prevention Policy Statements

5.1. TVDSB commits to ensuring that:

5.1.1. Every reasonable effort shall be made to promptly identify and address incidents of Fraud through the establishment and maintenance of a system of Internal Controls;

5.1.2. Any alleged Fraud, regardless of its dollar value or whom it relates to, shall be assessed for its validity;

5.1.3. Property, proprietary information, revenue and other assets are protected;

5.1.4. Financial information is accurately and appropriately presented;

5.1.5. The necessary information and training to TVDSB employees to mitigate the risk of Fraud is provided;

5.1.6. The TVDSB Employee Code of Conduct Policy (3017) and Procedure (3017a) communicates to all employees and members of the school community that the misuse or misappropriation of TVDSB assets will not be tolerated.

5.1.7. The validity assessment concerning an alleged Fraud by the Director of Education or Trustees/Supervisor will be conducted by External Parties.

5.1.8. If Fraud is substantiated, appropriate disciplinary and/or corrective action shall be taken; and

5.1.9. In the event of substantiated Fraud, the TVDSB shall make every reasonable effort to seek restitution for the loss incurred.

5.2. TVDSB's system strategy for Fraud prevention and management shall include:

5.2.1. The TVDSB Fraud Prevention and Management Procedure (1008a);

5.2.2. Providing support services to help departments and schools maintain strong Internal Controls;

5.2.3. An Anonymous Reporting Tool that allows TVDSB employees to anonymously and digitally communicate concerns regarding alleged Fraud;

5.2.4. The Anonymous Reporting Tool will initiate, where appropriate, external, bias-free validity assessments;

5.2.5. Communication with all TVDSB employees, volunteers and Trustees/Supervisor that they have a duty to report any instances or suspected instances of Fraud; and

5.2.6. An action plan to effectively address instances where Fraud has been substantiated.

6. Fraud Allegations Privacy and Information Security Considerations

6.1. TVDSB is committed to the appropriate collection, use, retention and disclosure of personal information in compliance with all applicable provisions in the Education Act, the Municipal Freedom of Information and Protection of Privacy Act, the Personal Health Information Protection Act, the Personal Information and Protection of Electronic Documents Act and other relevant statutes and regulations of the Province of Ontario and the Government of Canada.

6.2. This Policy and the associated Fraud Prevention and Management Procedure (1008a) will comply with all requirements of the TVDSB Privacy and Records Information Management Policy (2014) and Procedures (2014 a through c).

7. Monitoring and Review

7.1. TVDSB will use the information listed below in Sections 6.2 through 6.4 to provide recommendations for future changes to the Fraud Prevention and Management Procedure (1008a), as per TVDSB Development and Management of Board Policies and Administrative Procedures Policy (2032) and Procedure (2032a).

7.2. Following an incident of Fraud, the appropriate TVDSB Senior Administration based on the allegation submitted will conduct a risk assessment of any Internal Control deficiencies identified during the course of the validity assessment related to the Fraud or a subsequent investigation. If necessary, appropriate corrective action will be undertaken promptly to reduce the likelihood of a recurrence of the Fraud.

7.3. In the event that the External Parties' report details potential Internal Control deficiencies, these deficiencies shall be disclosed to the appropriate TVDSB Senior Administration based on the allegation through the Audit Committee, and the TVDSB Senior Administration will undertake appropriate corrective action to reduce the probability of a recurrence of the Fraud. The report will not be disclosed to a member of the TVDSB Senior Administration who was subject to the Wrongdoing and/or Fraud allegation.

7.4. TVDSB Administration and the External Parties will provide an annual Fraud summary report to the Audit Committee with the following information:

7.4.1. Summary of Direct Reporting of Fraud (Internal Reporting) and those received through the Anonymous Reporting Tool.

7.4.2. Summary of the analysis of Internal Controls identified in 6.2 and 6.3 that may need to be modified based on the Fraud reports received.

7.4.3. Summary of the identified Internal Control deficiencies and the status of corrective action.

8. List of Appendices

8.1. Appendix A – Policy Administrative Information

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Policy Number:	1008
Policy Owner:	Business Services
Effective Date:	2016 October 25
Amendment Dates:	2026 January 29
Review Dates	
EIE Review Date:	2025 May 21
Resources:	• The *Education Act*, RSO 1990, c E.2 ○ Ontario Regulation 361/10 • TVDSB Fraud Prevention and Management Procedure (1008a) • TVDSB Employee Code of Conduct Policy (3017) and Procedure (3017a) • TVDSB Privacy and Records Information Management Policy (2014) and Procedure (2014a) • TVDSB Employee Expense Reimbursement Policy (2003) and Procedure (2003a) • TVDSB Expense Reimbursement – Trustees Policy (1005) and Procedure (1005a) • TVDSB Harassment Policy (3004) and Procedure (3004a) • TVDSB School Generated Funds Policy (1009) and Procedure (1009a) • TVDSB Resolving Public Concerns Policy (2030) and Procedure (2030a)

- TVDSB Purchasing Policy (1001) and Procedure (1001a)
- TVDSB Expense Reimbursement Parent Involvement Committees (System & School) Procedure (2026a)
- TVDSB Surplus Furniture and Equipment Procedure (9013)
- TVDSB Conflict of Interest and Nepotism Policy (4021) and Conflict of Interest and Nepotism Procedure (4021a)