**Kiwi Park School**

**Theft and Fraud Prevention Policy**

***Adopted by the board on Day Month 202x***

This policy was approved and adopted by the board at its meeting held on *Day Month 202x* and came into effect on that date.

**Purpose**

1. The purpose of this policy is to access the risk of fraud and to prescribe the actions the school will take when any suspected fraud is discovered or reported.

**Policy content and guidelines**

1. The school values the integrity of its employees and students, and relies on them to act at all times in an ethical and honest manner.

**Definition**

1. For the purposes of this policy, unless otherwise stated, the following definitions shall apply:
	1. Fraud is an intentional act by management, staff or third parties to deceive others, usually by acts of deception, that involves, but is not limited to the:
* manipulation, falsification or alteration of records or documents
* suppression or omission of the effects of transactions from records or documents
* recording of false transactions
* misapplication of accounting policies
* misrepresentations in a financial report
* misappropriation (theft) of assets

**Responsibilities**

1. The board has zero tolerance on theft and fraudulent behaviour. The board:
	1. accepts that it has a responsibility to protect the physical and financial resources of the school.
	2. requires the principal to establish systems and procedures to guard against the actions of fraud and theft.
	3. sets out how to record and report suspected or actual fraud to the principal, the board, appropriate law enforcement authority or other agency.
	4. sets out that any investigation will be conducted in a manner that conforms to the principles of due process, equity and fairness.
2. All employees have obligations to notify and/or act on suspicions of dishonest behaviours and activities, even in the absence of proof.
	1. Any employee who is aware of or suspects fraudulent activity must promptly report such activity to the principal (or board member if appropriate).
	2. Any employee who reports a suspicion of fraud regarding another individual or the school in good faith will in no circumstances be threatened, intimidated, or dismissed because they acted in accordance with this policy.
3. All instances of suspected fraud will be treated confidentially and investigated promptly to a natural conclusion.
4. The principal will notify the board of the suspected fraud, as appropriate.

**Procedures**

1. In the event of suspected theft or fraud, the principal (or presiding member) shall act in accordance with the following procedures.
2. Any suspected theft or fraud must be investigated and will be subject to due process, equity, and fairness.
3. Seek advice from an expert, such as your liability insurer, your Ministry School Finance Adviser, auditor, forensic accountant, or solicitor.
4. Record the details of the allegation, the person or persons allegedly involved, and the quantity and/or value of the theft or fraud.
5. Inform the presiding member of the information received and consult with them as appropriate.
6. Meet with the person who is the subject of the allegation of theft or fraud and their representatives to explain the complaint against them.
7. Obtain a verbal or preferably a written response (all verbal responses must be recorded as minutes of that meeting, and the accuracy of those minutes should be attested by all persons present).
8. Advise the person in writing of the processes to be involved from this point on.
9. Lay a complaint with the New Zealand Police and if necessary, commission an independent expert investigation.
10. All instances where theft or fraud is proven will be prosecuted and the police will be assisted in any investigation as is required.

**Allegations concerning the principal or a board member**

1. Any allegation concerning the principal should be made to the presiding member.
2. Any allegation concerning board members should be made to the principal. The principal will then advise the Education Manager of the local office of the Ministry of Education and an investigation will commence.

**Disciplinary process**

1. In respect of persons suspected of having committed fraud the school will follow the relevant disciplinary procedures where fraud is proven (as set out in the Code of Conduct).

**Actions following proven fraud**

1. Where a suspected fraud is proven, the board will:
2. Direct the principal where the fraud has taken place, to put controls into place to mitigate further losses and prevent reoccurrence of similar misconduct.
3. Review the reasons for the incident, the measures taken to prevent a recurrence, and any action needed to strengthen future responses to fraud.
4. Advise the school’s insurers and Ministry of Education as appropriate (depending on the nature of the fraud).
5. Keep all other relevant personnel suitably informed about the incident and the school’s response.

**Recovery of Loss**

1. The recovery of the lost money or other property will be pursued following any fraud investigation.
2. The amount of any loss will be quantified as far as possible and repayment or reparation will be sought.

**Dealing with the Media**

1. Any person contacted by the media with respect to any fraud investigation shall refer the media to the board.

**Approval**

1. The board accepts that it has a responsibility to protect the physical and financial resources of the school. All appropriate measures to deter fraud will be taken.
2. When the board approved the policy, it was agreed that no variations of this policy or amendments can be made except by the unanimous approval of the board. This policy is subjected to a regular review at board level.
3. The board requires the principal to communicate this policy to all employees (new and old), including part-time and contract and training be provided to understand this policy.
4. This fraud policy shall also be made available to students and parents at their request.

Presiding Member: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ Signature: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

On behalf of, and with the authority of, the board on: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_