

Attachment F-21

Response Plan for Fraud, Theft, and Corruption

Introduction

The BARLD is committed to the highest possible standards of openness, integrity, and accountability in all its affairs. It is determined to maintain a culture of honesty and opposition to fraud, theft, and corruption. In line with that commitment, the BARLD's Anti-Fraud, Anti-Theft, & Anti-Corruption Policy outlines procedures relative to preventing, reporting and responding promptly to fraud, theft, and corruption.

The Response Plan for Fraud, Theft, and Corruption reinforces BARLD's proactive approach to prevention of such activities by defining the ways in which employees can report their concerns about suspected fraud, theft, or corruption as defined within this Plan.

Fraud is defined as:

Deception by persons internal or external to BARLD, which is carried out to conceal the misappropriation of assets, or for personal gain.

Theft is defined as:

The dishonest taking of property belonging to another with the intention of depriving the owner permanently of its possession.

Corruption is defined as:

The offering, giving, soliciting or acceptance of an inducement or reward, which may inappropriately influence the action of any employee or other person.

Concerns or allegations that fall within the scope of other existing policies (e.g., discrimination issues) will be referred to the Library Director for consideration under those policies.

Fraudulent or corrupt acts may include, but are not limited to, the following:

- Systems Issues - a process/system exists that is prone to abuse by either employees or the public
- Financial Reporting Issues - misstatements arising from fraudulent financial reporting or misstatements arising from misappropriation of assets
- Financial Issues - individuals or companies have fraudulently obtained money from BARLD
- Equipment Issues - BARLD equipment is used for personal use
- Resource Issues - there is a misuse of resources (cash, assets, and time)
- Other Issues - activities undertaken by employees that may be unlawful, violate BARLD

policies, fall below established standards of practices, or amount to improper conduct

If there is any doubt about the seriousness of concerns, contact the Library Director or the Board of Trustees.

Safeguards

BARLD's Response Plan to Fraud, Theft and Corruption contains explanations of safeguards for people raising concerns in good faith. These will be applied consistently in the case of all serious allegations, including concerns raised in connection with fraud, theft, and corruption.

How to Report Suspected Fraud, Theft, or Corruption

Employees

Employees are often the first to realize that something is seriously wrong or represents a potential problem. They may refrain from expressing their concerns because they feel speaking up would be disloyal to their colleagues. They may also fear harassment or victimization. The Disclosure Form for Fraud, Theft, or Corruption (Attachment F-15) is intended to encourage and enable staff to raise serious concerns rather than overlooking a problem.

Third Parties

BARLD encourages third parties who suspect fraud, theft, or corruption to contact either the Board of Trustees or the Library Director

How Allegations Will Be Dealt with by BARLD

Allegations by employees or third parties will be addressed as follows depending on the nature of the allegation:

- An internal investigation by Library Director, BARLD Board of Trustees, or an external auditor
- Referral of criminal matters to the police

Within 10 working days of a concern being received, the Board of Trustees will write to the complainant:

- Acknowledging that the concern has been received
- Indicating how the matter will be handled
- Giving an estimate of how long it will take to provide a final response
- Telling them the status of the initial investigation
- Telling them if any further investigations will take place, and if not, why

The investigation will be planned with consideration to the following:

- Resources required investigating the allegation
- Legal status of the allegation (*i.e.*, theft or breach of procedure)

- Internal disciplinary procedures
- Level of evidence required
- Protection of data and documents required
- Minimizing the effect on staff and third parties
- Recovery of lost funds and minimizing the potential for further loss
- Review of any improvements required to prevent re-occurrence

BARLD appreciates that individuals who report the alleged fraud, theft, or corruption need to be assured that the matter has been properly addressed. Thus, where appropriate, and subject to legal constraints, they will receive information about the outcome of any investigation.

If the allegation of fraud, theft, or corruption directly impacts a third party, BARLD's Board of Trustees will inform the most senior staff member at that organization.