

Policy Name:	Whistleblowing, Financial Fraud Prevention and Reporting
Originating/Responsible Department:	Financial Services
Approval Authority:	Senior Management Committee
Date of Original Policy:	January 2017
Last Updated:	November 2025
Mandatory Revision Date:	November 2030
Contact:	Associate Vice-President (Financial Services) and Chief Financial Officer General Counsel

Policy:

The University is committed to maintaining the highest standards of honesty, integrity and transparency in its financial activities to protect against financial fraud. The University is responsible for establishing internal controls and procedures to prevent financial fraud and to safeguard the resources with which it is entrusted.

The University will not tolerate financial fraud. University employees who engage in financial fraud may be subject to disciplinary action and may face civil and criminal legal proceedings.

All *Employees/Individuals* are required to act reasonably and in good faith in reporting and responding to alleged fraud or corruption and are required to co-operate with any investigation.

Purpose:

The purpose of the policy is to define, provide reporting procedures and protections for those reporting, and outline the potential consequences for fraudulent activity.

Scope:

This policy applies to all employees of Carleton University and to individuals and entities, including consultants, contractors, vendors and partners having business relationships with the University and involving the utilization, allocation or impacting upon University resources.

Definitions:

In this Policy:

“Fraud” or “Fraudulent Activity” means intentionally and dishonestly obtaining or attempting to obtain an unauthorized financial benefit, whether by dishonesty, deception, or other unethical means, to the advantage for any person or entity, or dishonestly attempting to cause a detriment to Carleton University. Examples of fraud include, but are not limited to:

Misappropriation or misuse of resources	<p>Theft of cash, inventory or equipment</p> <ul style="list-style-type: none"> * Unauthorized use or sale of assets for personal benefit * Assisting in the illegal transfer of assets * Causing a loss or creating a liability by deception * Using resources (including University facilities and any equipment) dishonestly, without approval or authority, or for personal or financial advantage
Misuse of position - whether for personal or for purported organizational advantage	<p>Paying or accepting kickbacks, bribes or secret commissions from or to third parties</p> <ul style="list-style-type: none"> * Receiving from a person or offering a bribe or facilitation payment to a person, including those in public office, so as to influence a decision that would mean that person would violate their official duty or fiduciary duty owed to the University * Seeking favours of any kind, including sexual favours or vouchers for services, in exchange for favourable treatment which would be dishonest or unlawful * Improperly using an official position to gain an advantage for oneself or another person
Contract management	<p>Accepting bribes, facilitation payments and/or "incentive gifts" from suppliers</p> <ul style="list-style-type: none"> * Negligent or deliberate mismanagement of contracts for personal or financial advantage * Inflating charges or costs for goods or services or substituting an inferior product for that contracted for
Financial transactions	<p>Forging or falsifying documents or signatures</p> <ul style="list-style-type: none"> * Dishonestly using procurement procedures and processes * Causing, assisting or enabling unauthorized or illegal transfers of funds or access to other benefits or advantages * Inappropriate use of University credit cards including using for personal purchases * Creating and causing payments to fictitious vendors or suppliers

“Employee” includes faculty and staff or a person engaged by the University to perform a service or services.

“Individual” refers to any person the University reasonably determines is included in the scope of this Policy.

Procedure:

Responsibility: All Employees

Reporting Procedure

- a) In the first instance, and as soon as possible, any employee who is aware of or reasonably suspects fraudulent activity shall report the activity to their supervisor. The supervisor shall immediately report the situation to the relevant Chair/Department Head;
- b) If the employee is concerned that their supervisor may be involved, the employee should notify the supervisor one level above or may report directly to the Department Head;
- c) For reports from a non-employee, or if for any reason the usual line of reporting (as set out above) would be inappropriate, suspicion of fraud complaints may be made directly to the General Counsel. Where the circumstances involve the General Counsel, the report should be made directly to the President. Where the circumstances involve the President, the report should be made directly to the Chair of the Board of Governors.

Note that to the extent possible, all information collected or received, shall be treated in confidence. There shall be no unauthorized disclosures except as is necessary to conduct a thorough investigation and to resolve the complaint, or where required by law.

Investigation Process:

Any report of suspected Fraudulent Activity will be immediately forwarded to the appropriate Intake Office.

- Where an academic employee is suspected of engaging in the Fraudulent Activity, the Intake Office is the Director, Labour Relations (Academic), Office of the Deputy Provost (or designate).
- Where a professional services employee is suspected of engaging in the Fraudulent Activity, the Intake Office is the Director, Staff and Labour Relations (Professional Services), Human Resources (or designate).

Where the Intake Office determines that the allegations, if true, would constitute Fraudulent Activity, an appropriate investigation shall be carried out in accordance with the principles of procedural fairness. The Intake Office may decline to open an investigation where it has determined that there is no reasonable basis for a suspicion of Fraudulent Activity, or where it has determined that a report is likely to be frivolous, vexatious or made in bad faith.

At any stage of the investigation, it may be necessary to implement administrative measures, which are temporary measures put in place to protect the parties to the investigation as well as the interests of the University. In determining the appropriate interim measures, the Intake Office will consult with the Vice-President (People, Finance and Operations), and/or other University officials as relevant.

Upon the conclusion of the investigation, the person alleged to have engaged in Fraudulent Activity will

be informed of the outcome. Complainants will be notified when the matter has concluded, but will not be informed of the outcome.

Consequences:

Where the investigation confirms that an individual has engaged in Fraudulent Activity, disciplinary procedures will be taken as reasonably required up to and including dismissal. If the investigation indicates that the acts may be criminal in nature, law enforcement agencies will be notified accordingly. However, where appropriate in the circumstances, law enforcement may be informed of a report of suspected Fraudulent Activity at any time following an initial report.

The University will take such steps as it deems reasonable and necessary and shall make good faith efforts to recover any losses incurred through fraudulent acts.

Whistleblower Protection:

Anonymous reports of suspected Fraudulent Activity are difficult to investigate. The University will maintain confidentiality to the extent possible. However, disclosure may be required to fully investigate the matter in accordance with the principles of procedural fairness, or to comply with legal obligations.

Anyone reporting suspicion of Fraudulent Activity, acting in good faith, will be protected from retaliation and reprisal.

Any employee who makes allegations of Fraudulent Activity in bad faith may be subject to discipline.

Oversight by the Board of Governors Audit and Risk Committee

Where a report of suspected Fraud has been received that may result in a significant financial or reputational impact, the Audit and Risk Committee of the Board of Governors shall be informed.

Contacts:

Associate Vice-President, (Financial Services) and Chief Financial Officer
General Counsel

Links to related Policies:

Conflict of Interest and Commitment Policy
Procurement Card Policy
Responsible Conduct of Research
Risk Management Policy