

**TITLE: ANTI-FRAUD POLICY**

It shall be the policy of Gogebic Community College to charge Administrators and Directors with the primary responsibility for identifying potential areas of risk, for being aware of the possibility that fraudulent acts could occur in those areas, and for implementing measures to eliminate or minimize fraud. All employees are expected to refrain from acts of fraud or fraudulent behavior, and are encouraged to report suspected fraud.

This policy is designed to increase awareness by all employees of Gogebic Community College of their responsibility for reporting suspected fraud. The creation and implementation of, and adherence to, this fraud policy will help assure that the highest standards of professional ethics are maintained by all.

Fraud encompasses an array of irregularities and illegal acts characterized by intentional deception. These include, but are not limited to, theft, embezzlement, bribery, misappropriations, falsifying records, forgery or alteration of documents or electronic records, kickbacks, destruction or removal of property, and conflicts of interest. Reference is hereby made to Gogebic Community College's policy and guidelines regarding Conflict of Interest and any other policy, which may be applicable to the issues of this Fraud Policy.

When suspected fraudulent incidents or practices are observed by or made known to an employee, the incident or practice shall be reported to the offices of Business Services or Human Resources. The College will endeavor to maintain the confidentiality of all individuals who are involved in the reporting and/or investigation of the incident. The Business Office shall prepare a report recommending actions to be taken to reduce additional losses and to prevent a recurrence of the fraud.

Date of Adoption: 4/27/2021