

# International Dark-Sky Association

## Fraud Policy

Adopted 15 September 2014

### I. Purpose

The purpose of this policy is

1. To ensure that all parties are aware of their responsibilities for identifying exposures to fraudulent activities and for establishing controls and procedures for preventing such fraudulent activity and/or detecting such fraudulent activity when it occurs.
2. To provide guidance to staff as to action which should be taken where they suspect any fraudulent activity.
3. To provide a clear statement to staff forbidding any illegal activity, including fraud for the benefit of the organization
4. To provide assurance that any and all suspected fraudulent activity will be fully investigated.

### II. Policy

1. The Board of the International Dark-Sky Association has ultimate responsibility for the prevention and detection of fraud and is responsible for ensuring that appropriate and effective internal control systems are in place.
2. All managers must ensure that there are mechanisms in place within their area of control to:
  - (i) assess the risk of fraud
  - (ii) educate employees about fraud prevention and detection
  - (iii) facilitate the reporting of suspected fraudulent activities
3. All staff share in the responsibility for the prevention and detection of fraud in their areas of responsibility. Any staff member who suspects fraudulent activity must immediately notify their supervisor or those responsible for investigations. In situations where the supervisor is suspected of involvement in the fraudulent activity, the matter should be notified to the IDA Board Treasurer and the next highest level of supervision.
4. Any fraud by any staff member shall constitute grounds for dismissal.

### III. Procedures

1. Fraud prevention accounting procedures shall be incorporated in the organization's policies related to Cash Management, Credit Card Use, Commercial Transactions, and Investment.
2. All complaints of suspected fraudulent behavior will be investigated, while also providing for the protection of those individuals making the complaint and natural justice to those individuals being the subject of any such complaint.
3. Where a prima facie case of fraud has been established the matter shall be referred to police. Any action taken by police shall be pursued independently of any employment-related investigation by the organization.
4. Recruitment strategies shall incorporate fraud prevention;
  - o Applicants shall be required to undergo background checks for all positions with financial responsibilities
  - o Previous employers and referees shall be contacted
  - o Transcripts, qualifications, publications and other certification or documentation shall be validated
5. Fraud prevention and detection issues will be included in relevant staff development and induction activities.