



Cook Islands Sports & National Olympic Committee

THEFT & FRAUD POLICY

1. POLICY

The Cook Islands Sports & National Olympic Committee Board has the responsibility of protecting the physical and financial resources of the organisation. Management is responsible for the detection and prevention of fraud and misappropriation.

2. SCOPE

This Policy applies to all Board members, Staff, contractors, volunteers and clients of CISNOC.

3. PRINCIPLES

- 3.1. Physical resources must be kept secure and accounted for.
- 3.2. Board and staff members with responsibility for security of physical and financial resources are competent and accountable in carrying out their duties.
- 3.3. To ensure that CISNOC operates internal procedures to prevent and detect theft and fraudulent actions.
- 3.4. To prevent theft and fraud from happening
- 3.5. To implement financial controls and asset management processes that minimise and or deal with possible theft and fraud
- 3.6. To ensure any investigation into theft and fraud will be conducted in a manner that conforms to principles of natural justice and is procedurally just and fair.
- 3.7. To undertake assessments to help the Board, managers and staff to assess the adequacy of existing controls and to determine whether additional fraud and theft prevention counter-measures are required.

4. ACTIONS CONSTITUTING FRAUD OR THEFT:

Fraud or Theft can be described as:

- 4.1. Any dishonest or fraudulent act
- 4.2. Forgery or alteration of any document or account belonging to the organization
- 4.3. Forgery or alteration of a cheques, bank draft or any other financial document
- 4.4. Misappropriation / theft of funds, securities, supplies, resources, equipment or other assets
- 4.5. Impropriety in the handling or reporting of money or financial transactions
- 4.6. Destruction, removal or inappropriate use of records, furniture, fixtures and equipment

5. PROCEDURES TO ASSESS THE LEVEL OF RISK OR FRAUD

- 5.1. CISNOC's Theft and Fraud Risk Assessment will be undertaken on an annual basis, as delegated by the Secretary General / Chief Executive Officer.
- 5.2. All areas with a significance rating of 'high' or 'very high' will have strategies for improvement developed and implemented immediately.
- 5.3. All other areas showing improvements required will have an action plan developed and implemented within three months of the assessment's completion.
- 5.4. The completed Risk Assessment template will be presented to the Executive Committee of the Board in Oct/Nov of each year.

6. PROCEDURES TO DEAL WITH SUSPECTED FRAUD OR THEFT

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- 6.1. All staff have a responsibility to immediately inform the Secretary General / Chief Executive Officer should they suspect or become aware of any theft or fraudulent actions by any persons including employees, contractors or any person associated with the organisation.
- 6.2. If the employee is not comfortable in reporting such matters to the Secretary General / Chief Executive Officer, they should discuss the matter with the Board President.
- 6.3. All information relating to allegations will be treated confidentially. The progression of investigations will be handled in a confidential manner and will not be disclosed or discussed with any other person(s) other than those authorised to be involved. This is important in order to avoid harming the reputation of suspected persons who are subsequently found innocent of wrongful conduct.
- 6.4. The Secretary General / Chief Executive Officer will inform and consult with the Board President within 24 hours of an allegation being made.
- 6.5. In the event of an allegation of theft or fraud, the Secretary General / Chief Executive Officer (or Board President if directly approached by an employee) shall:

As far as possible within 24 hours:

- 6.6. Record the details of the allegation, the person or persons allegedly involved and the quantity / value of the theft or fraud.
- 6.7. Request a written statement from the person who has informed the Secretary General / Chief Executive Officer / Board President with details as to the nature of the theft or fraud, the time and circumstances in which this occurred and the quantity / value of the theft or fraud.
- 6.8. Decide on the initial actions to be taken including with the person who provided the information.
- 6.9. On the basis of the information and advice received, the Secretary General / Chief Executive Officer / Board President shall decide whether or not a *prima facie* case of theft or fraud exists, and if not, to document this decision and record that no further action is to be taken.

7. THEFT OR FRAUD IS UPHELD

If a prima facie case is exists as based on a full investigation:

- 7.1. Invoke any disciplinary procedures contained in the Employment Agreement and as outlined in the **Code of Conduct Policy** if it is an employee.
- 7.2. Lay a complaint with the Police.
- 7.3. If necessary, commission an independent expert investigation and or seek legal advice as to what further action should be taken.

If a case is considered to exist the Secretary General / Chief Executive Officer/Board President shall:

- 7.4. Inform the person in writing of the allegation that has been received and request a meeting with them at which their representative(s) is invited to attend.
- 7.5. Meet with the person who is the subject of the allegation of theft or fraud and their representatives to explain the complaint against them.

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- 7.6. Obtain a verbal or preferably a written response. Verbal responses must be recorded as minutes of the meeting and the accuracy of those minutes should be attested by all persons present.
- 7.7. Advise the person in writing of the processes from this point on.
- 7.8. Should a case be deemed to be answerable then the due process of the law shall apply to the person(s) implicated.

Any allegation concerning the Secretary General / Chief Executive Officer should be made to the Board President who will then follow the procedures laid out in this policy. Any allegation concerning a member of the Board should be made to the Secretary General / Chief Executive Officer who will then follow the procedures laid out in this policy.

Other Relevant Documents:

- Employment Agreement
- Incident Investigation
- Disciplinary Process

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