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## Community College of Beaver County

### BOARD OF TRUSTEES POLICY STATEMENT

Section	3	Finance, Facilities and Technology
Policy	3.030	Prohibition of Fraudulent Activities Policy

Acknowledging its public fiduciary responsibility and its desire to ensure public trust, it is the expectation of the Board of Trustees that all individuals representing the College will act with the highest integrity, exercise due diligence, and comply with all relevant statutory and regulatory requirements in conducting the business of the College. To this end, it is the mandate of the Board that Trustees, college employees, volunteers, consultants, vendors, contractors and other individuals engaged in a relationship with the College avoid even the appearance of impropriety or engaging in fraudulent activities.

For the purposes of this policy, fraudulent activities will include, but not be limited to the following:

1. Forgery or unauthorized alteration of any document or account belonging to the College;
2. Forgery or unauthorized alteration of a check, bank draft or other financial document;
3. Misappropriation of funds, securities, supplies or other assets;
4. Impropriety in handling money or reporting financial transactions;
5. Profiteering through the use of insider information from the College;
6. Disclosure of confidential and/or proprietary information to outside parties;
7. Seeking personal gain through acceptance of or seeking anything of material value, other than items used in the normal course of advertising, from contractors, vendors or persons providing services to the College;
8. Destruction, removal, or inappropriate use of College records, furniture, fixtures, equipment or property;
9. Failure to provide financial records to authorized state, federal or local entities;
10. Failure to cooperate fully with financial auditors, investigators or law enforcement officials as may be required by law;
11. Other dishonest or fraudulent acts involving the fiscal or physical resources of the College.

The President and the Vice President for Finance and Operations shall be responsible for development of procedures and internal controls serving to prevent or detect fraud, financial impropriety, or fiscal irregularities within the College. Such controls shall be regularly reviewed by the Colleges independent, external auditor to identify potential remaining risks, to evaluate the nature and extent of such risks, and to provide guidance in appropriately addressing such risks. Any risks identified by the external auditor shall be reported to the Board to ensure the risk is appropriately addressed.