

Policy Number: GV2.062	Policy Section: Governance	Effective: March 31, 2007 Amended: February 20, 2025
Title: Theft, Fraud and Corruption Policy		Executive Sponsor: CEO

SUMMARY

This policy explains what theft, fraud and corruption are at CLBC.

It describes how people can make reports to CLBC, and how CLBC responds.

1. PURPOSE

CLBC strives to achieve the highest standards of ethical, moral and legal conduct.

In support of that objective, this policy establishes principles related to the development, implementation and regular review of processes designed to mitigate the risk of theft, fraud or corruption impacting either Community Living British Columbia (CLBC) or an individual supported by CLBC.

This policy is applicable to employees and others who work within and with CLBC, including individuals supported by CLBC programs, service providers, contractors, CLBC board members and the general public.

2. DEFINITIONS

Theft: The act of stealing, taking or removing corporate or personal property, including intellectual property, monetary or other physical goods, without appropriate authorization and which adversely impacts either CLBC or an individual supported by CLBC.

Fraud: A deliberate act of deception, manipulation or dishonesty, with the specific intent of gaining an unfair or dishonest advantage, which adversely impacts either CLBC or an individual supported by CLBC.

Corruption: The offering, giving, soliciting or acceptance of an improper inducement or reward, intended to influence the decision, decision-making process, or action of any person and adversely impact either CLBC or an individual supported by CLBC.

Individual: A person 19 years of age or older who is eligible for CLBC services, as described in the CLBC *Eligibility Policy*.

Reporter: Any person making a report in good faith of suspected theft, fraud or corruption according to the processes established in the *Theft, Fraud and Corruption Reporting and Investigation Guidelines*.

Wrongdoing: As defined in the *Public Interest Disclosure Act (PIDA)* and for the purposes of the *PIDA Policy*, “wrongdoing” means conduct in or relating to CLBC that is:

- a) A serious act or omission that, if proven, would constitute an offence under an enactment of British Columbia or Canada;
- b) An act or omission that creates a substantial and specific danger to the life, health or safety of persons, or to the environment, other than a danger that is inherent in the performance of an employee's duties or functions;
- c) A serious misuse of public funds or public assets;
- d) Gross or systemic mismanagement;
- e) Knowingly directing or counselling a person to commit a wrongdoing described in paragraphs (a) to (d).

3. POLICY

3.1 CLBC will not tolerate theft, fraud or corruption.

3.2 Employees are responsible to report known or suspected theft, fraud or corruption immediately.

3.3 CLBC considers that persons, other than employees, who work within and with CLBC have a public and/or professional responsibility to report known or suspected theft, fraud or corruption.

3.4 CLBC will investigate and respond to reports of known or suspected theft, fraud or corruption.

3.5 For circumstances that meet the definition of wrongdoing under the *Public Interest Disclosure Act*, the *CLBC Public Interest Disclosure Policy and Procedures* apply.

3.6 Acts of reprisal against any person making a report under this policy are prohibited. CLBC will not tolerate acts of reprisal against any person who has, in good faith:

- Sought advice about making a disclosure;
- Made a disclosure; or
- Co-operated in an investigation of a disclosure of possible theft, fraud or corruption under this policy.

Acts of reprisal should be reported directly to the Director, People Services and Total Rewards.

4. PROCEDURES

4.1 Instances of known or suspected theft, fraud or corruption must be reported in accordance with the processes outlined in the CLBC *Theft, Fraud and Corruption Reporting and Investigation Guidelines*.

4.2 Reports may be made anonymously. While anonymous reports are accepted, there must be enough information to ensure CLBC is able to follow up.

4.3 Reported instances of known or suspected theft, fraud or corruption will be investigated and resolved in accordance with the processes outlined in the CLBC *Theft, Fraud and Corruption Reporting and Investigation Guidelines*.

5. REFERENCES

[BC Freedom of Information and Protection of Privacy Act \(FOIPPA\)](#)

[BC Public Interest Disclosure Act](#)

[BCGEU Collective Agreement Article 32.17 \(regarding disclosure of information\)](#)

[Board Governance Manual](#)

[CLBC Conflict of Interest Policy - Employees](#)

[CLBC Eligibility Policy](#)

[CLBC Legal Requirements Policy](#)

CLBC Public Interest Disclosure Policy

CLBC Public Interest Disclosure Procedures

CLBC Theft, Fraud and Corruption Report Form

CLBC Theft, Fraud and Corruption Reporting and Investigation Guidelines

Standards of Conduct for CLBC Employees