ANTI-FRAUD POLICY

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KALASALINGAM ACADEMY OF RESEARCH AND EDUCATION

(Deemed to be University)

(Under the section 3 of UGC act 1956)

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ANTI-FRAUD POLICY

Policy Preparation & Verification Team

Prepared: 2024

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ANTI-FRAUD POLICY

1. INTRODUCTION

Kalasalingam Academy of Research and Education is committed to upholding the highest standards of integrity, transparency, and accountability in all academic, administrative, financial, and research activities. Fraudulent practices, whether financial or non-financial, undermine institutional credibility, disrupt governance, and erode stakeholder trust.

This Anti-Fraud Policy establishes a structured framework to prevent, detect, investigate, and respond to fraud within the University. It promotes ethical conduct and ensures that all stakeholders operate within a system of strong internal controls and compliance mechanisms.

The policy reflects the University's zero-tolerance approach toward fraud and aligns with best practices in governance, risk management, and data protection.

2. PURPOSE

The purpose of this policy is to:

- Provide a clear understanding of what constitutes fraud within the University context
- Establish preventive measures to reduce the risk of fraudulent activities
- Define roles and responsibilities for fraud prevention and detection
- Outline procedures for reporting, investigating, and addressing fraud
- Protect the University's financial resources, intellectual property, data, and reputation
- Foster a culture of integrity, accountability, and ethical behavior

3. DEFINITIONS

3.1 Members

"Members" of Kalasalingam Academy of Research and Education include:

- Faculty (permanent, visiting, adjunct)
- Administrative and technical staff
- Students, research scholars, and interns
- Contractual employees and outsourced personnel
- Vendors, consultants, and service providers
- Any individual or entity associated with the University's operations

3.2 Fraud

Fraud refers to any intentional act, omission, or misrepresentation carried out to deceive or gain unauthorized benefit, resulting in financial loss, reputational damage, or misuse of institutional resources.

Fraud may include, but is not limited to:

- Financial Fraud: Embezzlement, misappropriation of funds, falsification of financial records.
- Admission and Employment Fraud: Submission of fake or forged educational certificates, experience certificates, identity documents, or other credentials for admission, recruitment, promotion, or employment within the University.
- Academic and Examination Fraud: Marks manipulation, unauthorized alteration of academic records, impersonation during examinations, plagiarism, data fabrication, falsification of research results, or any attempt to obtain academic benefits through dishonest means.
- Administrative Fraud: Manipulation of records, false reporting, unauthorized approvals.
- Procurement Fraud: Vendor collusion, kickbacks, inflated invoices.
- Cyber/Data Fraud: Unauthorized system access, identity theft, data manipulation.
- Misuse of Assets: Unauthorized use of University property or resources.

4. OBJECTIVES OF POLICY

The key objectives of this policy are:

- To establish a robust framework for fraud risk management
- To minimize the occurrence of fraudulent activities through preventive controls
- To ensure early detection and timely intervention
- To promote transparency and accountability across all functions
- To safeguard financial, physical, and digital assets
- To ensure compliance with applicable legal and regulatory requirements
- To encourage ethical conduct and responsible behavior among members

5. GENERAL PRINCIPLES

The Anti-Fraud Policy is guided by the following principles:

- Zero Tolerance: Any form of fraud is strictly prohibited and will be dealt with firmly
- Integrity and Ethics: All members must act with honesty and professionalism
- Conflict of Interest: All members shall disclose any actual, potential, or perceived conflict of interest that could influence decision-making or create opportunities for fraudulent or unethical conduct. Failure to disclose such conflicts may constitute misconduct under this policy.
- Accountability: Individuals are responsible for their actions and decisions
- Confidentiality: All fraud-related information and investigations will be handled discreetly
- Transparency: Processes related to fraud reporting and investigation will be clear and fair
- Preventive Approach: Emphasis on internal controls and risk mitigation strategies
- Non-Retaliation: Protection will be provided to individuals reporting fraud in good faith

6. RESPONSIBILITIES

6.1 University Management

- Establish and maintain internal control systems
- Ensure effective implementation of this policy
- Promote a culture of ethical conduct

6.2 Faculty and Staff

- Adhere to institutional policies and ethical standards
- Report suspected fraud promptly
- Cooperate with investigations

6.3 Students and Research Scholars

- Maintain academic integrity
- Avoid misconduct such as plagiarism or falsification
- Report unethical practices

6.4 Internal Audit / Vigilance Committee

- Conduct regular audits and risk assessments
- Investigate reported fraud cases
- Recommend corrective and preventive measures

6.5 IT Department

- Implement cybersecurity measures
- Monitor system access and data usage
- Prevent unauthorized access and data breaches

6.6 Vendors and Third Parties

- Comply with contractual and ethical obligations
- Avoid conflicts of interest and fraudulent practices

6.7 Every Member of the University

All members shall promptly disclose any known or suspected fraudulent activity, avoid participation in fraudulent practices, cooperate with investigations, and complete periodic ethics and anti-fraud awareness training conducted by the University.

7. POLICY VIOLATION

Any violation of this Anti-Fraud Policy will be treated seriously and may result in:

- Disciplinary action, including suspension or termination
- Academic penalties (for students/researchers)
- Financial recovery or restitution
- Legal action under applicable laws
- Blacklisting of vendors or contractors

All cases will be investigated thoroughly, ensuring fairness and due process.

8. SUPPORTING POLICIES, PROCEDURES & FUNCTIONS

This Anti-Fraud Policy operates in conjunction with other institutional frameworks, including:

- Data Protection Policy – for safeguarding sensitive and personal data
- Cybersecurity Policy – for protection against digital threats and breaches
- Code of Conduct & Ethics Policy – for guiding behavior and professional standards
- Whistleblower Policy – for secure and confidential reporting mechanisms
- Financial Regulations & Audit Procedures – for ensuring financial integrity
- Procurement Policy – for transparent and fair purchasing processes

Additionally, the University will support this policy through:

- Regular training and awareness programs
- Risk assessment and fraud prevention strategies
- Periodic audits and compliance reviews
- Technology-enabled monitoring systems

9. FRAUD RESPONSE PROCEDURE

Kalasalingam Academy of Research and Education shall adopt a structured and systematic approach to respond to any suspected or confirmed fraud to ensure timely action, fairness, and protection of institutional interests.

9.1 Reporting of Suspected Fraud

- Any member who suspects or becomes aware of fraudulent activity shall report it as soon as reasonably practicable, preferably within seven (7) working days of discovery, through the designated reporting channels. Delayed reporting shall not invalidate a complaint if reasonable justification exists.
- Whistleblower mechanism (including anonymous reporting). Anonymous complaints will be considered for investigation only where they contain sufficient credible information or supporting evidence to permit a meaningful preliminary assessment.
- Reports should include all relevant details, supporting evidence (if available), and a clear description of the incident.

9.2 Preliminary Assessment

The preliminary assessment shall ordinarily be completed within ten (10) working days from the date of receipt of the complaint. Where the matter is complex, the period may be extended with recorded reasons.

- Upon receiving a complaint, a preliminary review will be conducted to:
  - Assess the credibility and seriousness of the allegation
  - Determine whether sufficient grounds exist for a formal investigation
  - Identify immediate risks to assets, data, or operations
- If the complaint is found to be malicious or baseless, appropriate action may be taken.

9.3 Formation of Investigation Committee

- A formal investigation committee shall be constituted, which may include:
  - Representatives from Internal Audit / Vigilance
  - Legal/Compliance Officer
  - Domain experts (if required)
- The committee shall operate independently and ensure impartiality.

9.4 Investigation Process

The investigation shall include:

- Collection and preservation of evidence (documents, digital records, logs)
- Interviews with concerned individuals
- Analysis of financial transactions, academic records, or system logs
- Identification of the root cause and extent of fraud

All investigations must be conducted in a confidential, unbiased, and time-bound manner. The formal investigation should ordinarily be completed within twenty (20) working days from the completion of the preliminary assessment. In exceptional circumstances requiring additional evidence or expert consultation, the investigation period may be extended with the approval of the competent authority, and the reasons shall be documented.

9.5 Interim Actions

Where necessary, the University may take interim measures to prevent further damage, such as:

- Suspension of access to systems or financial accounts
- Temporary suspension of individuals involved
- Securing sensitive data and assets

9.6 Reporting of Findings

- The investigation committee shall submit a **detailed report** including:
    - Nature and extent of fraud
    - Evidence and findings
    - Individuals involved
    - Financial or reputational impact
    - Recommendations for corrective action

The Investigation Committee shall submit its final report to the Competent Authority within seven (7) working days after completion of the investigation.

9.7 Disciplinary and Legal Action

Based on the findings, appropriate actions will be taken, including:

- Disciplinary action (warning, suspension, termination)
- Academic penalties (for students/researchers)
- Recovery of financial losses
- Legal proceedings under applicable laws

9.8 Communication and Closure

- Relevant stakeholders will be informed of the outcome where necessary
- The case will be formally closed after implementing corrective actions
- Lessons learned will be documented to prevent recurrence

9.9 Protection of Whistleblowers

- Individuals reporting fraud in good faith will be protected from retaliation
- Confidentiality of identity will be maintained to the extent possible

9.10 Record Keeping

Fraud investigation records shall be retained securely for a minimum period of seven (7) years or for such longer duration as may be required under applicable laws, regulatory requirements, or ongoing legal proceedings.

- All fraud-related records, reports, and evidence shall be securely maintained
- Documentation shall be retained as per institutional and legal requirements

Conclusion

This Anti-Fraud Policy reinforces Kalasalingam Academy of Research and Education’s commitment to ethical governance, transparency, and accountability. All members are expected to uphold the principles outlined herein and contribute to a secure and trustworthy institutional environment.