

SOUTH AFRICAN NURSING COUNCIL

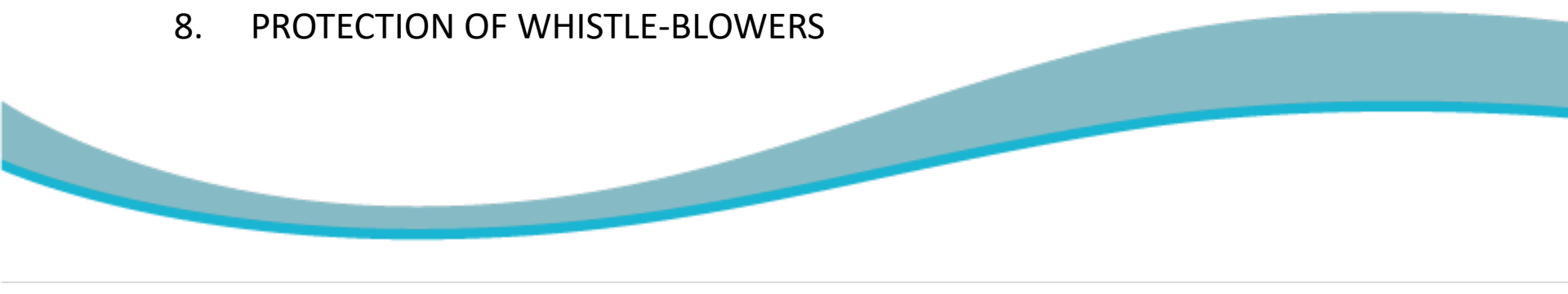
FRAUD MANAGEMENT




South African Nursing Council

Regulating nursing, advocating for the public


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1. PURPOSE

- To present the SANC's fraud Management Policy and Procedure;
 - Provide guidelines on how to respond, should one be aware of instances of fraud and corruption;
 - Outline process followed by SANC when an incidents of fraud and/or corruption are reported; and
 - Raise awareness on the whistle-blowing process and protection; and
 - Confirm that SANC supports and fosters a culture of zero tolerance to fraud and corruption.
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2. SANC POLICY POSITION ON FRAUD AND CORRUPTION

- The SANC is committed to promoting a culture of integrity, ethical conduct, and accountability where employees and other stakeholders are comfortable and confident about reporting known or suspected fraudulent, corrupt and unethical conduct.
 - Adopted a comprehensive approach to the management of fraud risks.
 - Policies and documents:
 - Fraud Management Framework;
 - Fraud Management Policy and Procedure;
 - Fraud and Corruption Strategy;
 - Employee Code of Conduct and Ethics;
 - Rules for Conduct of Business;
 - Disciplinary Policy; and
 - Grievance Procedure.
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4. DEFINITIONS

4.1 Fraud:

The unlawful and intentional making of a misrepresentation which causes actual and/or potential prejudice to another.

4.2 Corruption:

The unlawful practice of offering, giving, receiving or soliciting of anything of value, an inducement or reward which may improperly influence the action of another person in the execution of their duties.

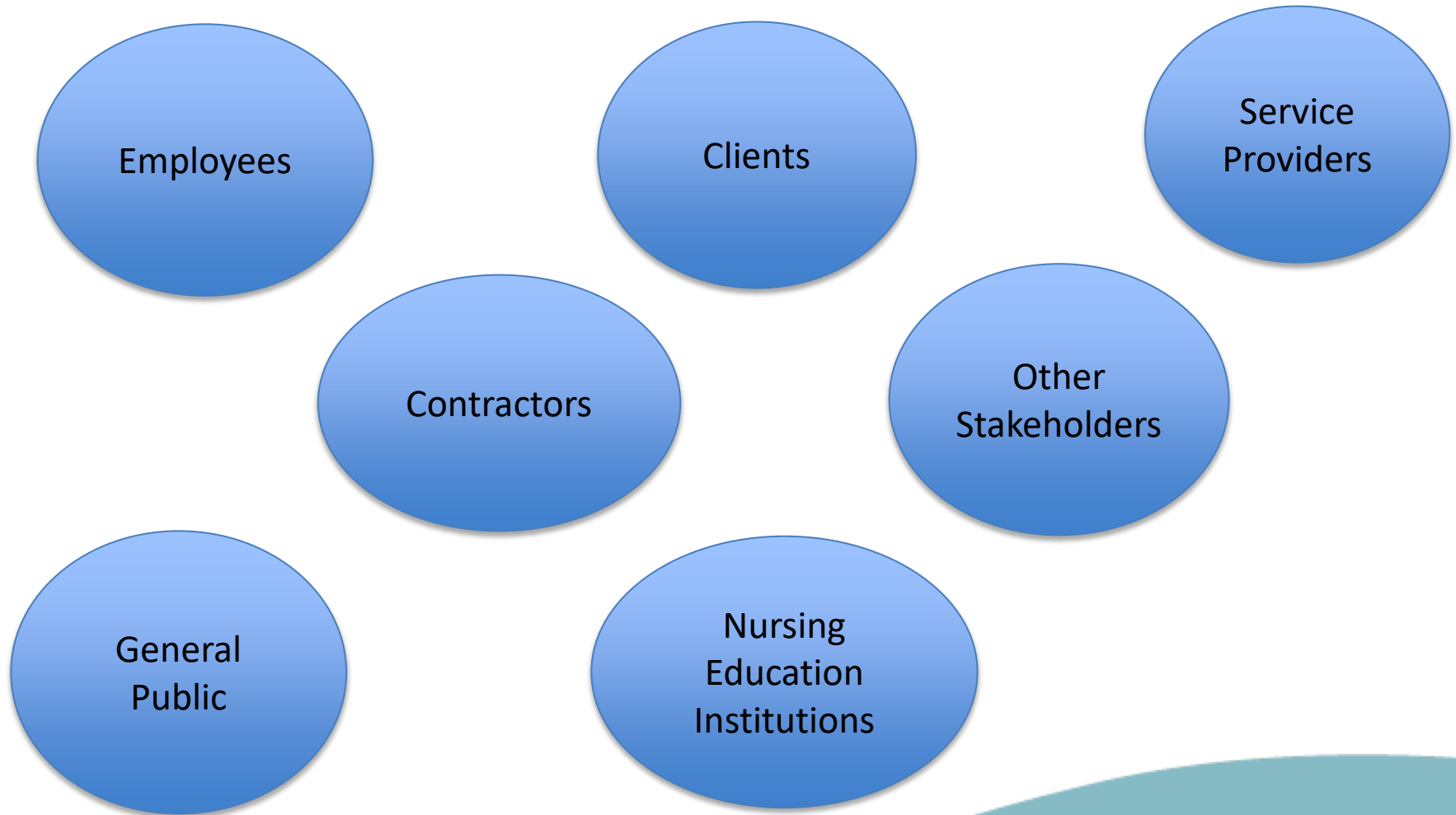
4.3 Unethical Behaviour

An action that falls outside of what is considered right or proper for a person, a profession or an industry.



5. REPORTING FRAUD, CORRUPTION AND UNETHICAL CONDUCT

5.1 WHO CAN REPORT



5.2 WHAT SHOULD BE REPORTED

Forgery

Corruption

Profiting
from
official
position

Irregular
recruitment
processes

Collusion

Manipulation
of systems
and controls

Abuse of
power/
privilege/
information


Misconduct
and
unethical
conduct

Fraud

Procurement
Irregularities

Misappropriation
of funds

5.3 INFORMATION TO BE PROVIDED

- **Who** is involved?
 - **What** is the nature of the incident?
 - **When** did the incident take place.
 - **Where** specifically did the incident happen?
 - **How** was the incident committed and how long has it been going on?
 - How often does this happen?
 - Does anybody else know about it?
 - Do you have any proof?
 - Are there any witnesses?
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5.4 WHERE TO REPORT

Internal Reporting

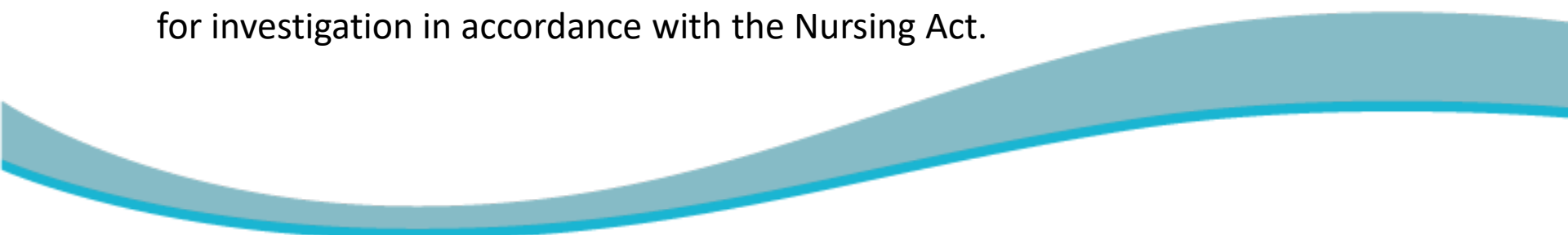
In instances where the allegation may be to be reported to the following:

- Immediate line manager;
- Senior Management;
- Registrar and Chief Executive Officer;
- Senior Manager: Internal Audit and Risk Management;
- Relevant member of the SANC Executive Management Committee;
- Audit and Risk Committee Chairperson; and
- The Chairperson of the Council.

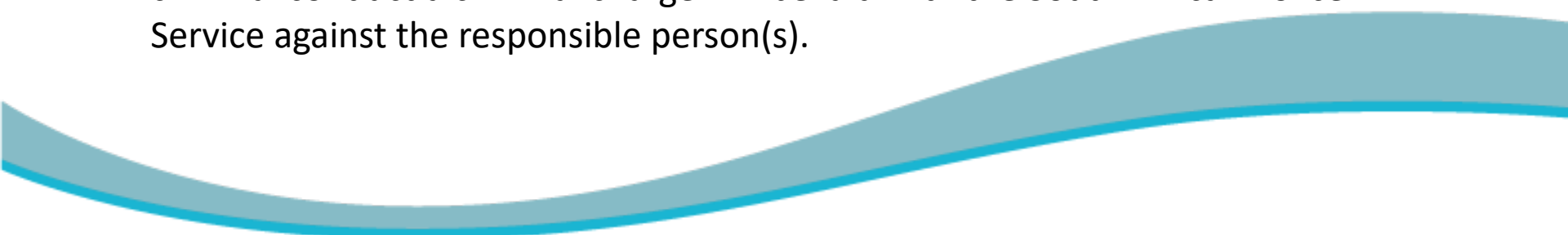
External Reporting (Fraud Hotline)

- The Fraud Hotline was established to:
 - Protect the anonymity of employees and stakeholders wanting to blow the whistle and remain anonymous.
 - Protect the SANC's processes, reputation and operations; and
 - Maintain a culture of ethical compliance.
- Operated by an independent service provider: KPMG
- Can be conducted via:
 - **Call: 0800 20 12 16**
 - Mail: Hotline@kpmg.co.za.
 - Post: BNT 371, PO Box, 14671, Sinoville, 0129.
 - Fax: 0800 200 796.


6. CONDUCTING INVESTIGATIONS

- **A preliminary review** is conducted by the recipient to understand the nature of the incident reported and the parties involved.
 - The seriousness of the impropriety raised;
 - Whether the impropriety is continuing or is likely to continue in the future;
 - The credibility of the concern; and
 - The likelihood of confirming the allegation.
 - **A plan of action** will be recommended for approval by the Registrar and CEO or Chairperson of Council which may include:
 - No follow-up work to be conducted.
 - Refer the matter for investigation to the relevant senior personnel independent of the area of suspicion or an independently appointed person.
 - Matters relating to Nursing Practice, Learner Affairs and Education and Training are referred to the relevant Senior Managers and/or Deputy Registrar for investigation in accordance with the Nursing Act.
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7. REPORTING ON FINDINGS AFTER INVESTIGATION

- If an employee makes a protected disclosure, they are notified of the action taken or proposed to be taken after the completion of the investigation.
 - The Senior Manager Internal Audit and Risk Management communicates with the whistle-blower via the service provider, the manner in which reported cases have been dealt with.
 - Reporting of cases to governance structures: All Fraud and corruption incidents are reported to the Audit and Risk Committee and Council on a quarterly basis.
 - Reporting of cases to Human Resources Department: If the investigation into the cases of fraud, corruption and unethical conduct confirms that an employee is responsible, matter will be referred to the Human Resource Department to institute disciplinary processes.
 - If the investigation conducted confirms a case of fraud, corruption or other criminal conduct a criminal charge will be laid with the South African Police Service against the responsible person(s).
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8. PROTECTION OF WHISTLE-BLOWERS

- **Confidentiality:** All information relating to alleged cases of fraud, corruption and unethical conduct that is received through the fraud hotline or reported through internal channels and investigated will be treated with confidentiality.
 - **Protection of Individual's Identity:** The SANC will do its best to protect an individual's identity when he/she raise a concern and does not want their identity to be disclosed.
 - When a caller contact the Fraud Hotline run by the service provider, they will not be required to give their names or any personal details.
 - There is no caller identification, so the service provider does not know from where the call is made. Even though all calls are recorded, The SANC will not have access to the recording, no one will identify the voice.
 - The service provider strips out any information that could lead to the identity of the caller, the SANC only gets a very factual report of the alleged wrongdoing with no additional information.
 - **Occupational Detriment:** The SANC does not tolerate harassment, victimisation or retaliation against whistle-blowers and will take action to protect employees when they raise a concern in good faith.
 - **Remedies Available:** In the event that a whistle blower suffers victimisation or reprisal, the whistle blower may follow the grievance processes of the SANC.
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**STOP
FRAUD**

**REPORT CORRUPTION, FRAUD AND
OTHER UNETHICAL BEHAVIOUR**

THANK YOU