

POLICY RELATING TO PERSONNEL MANAGEMENT

FRAUD PREVENTION POLICY

Introduction

The Wachusett Regional School District recognizes the importance of protecting the District, its operations, its employees and its assets against financial risks, operational breaches and unethical activities. Therefore, it is incumbent upon the Wachusett Regional School Committee, Superintendent, and administrative staff to institute and clearly communicate the fraud prevention policy to employees.

The Wachusett Regional School District recognizes a zero tolerance policy regarding fraud and corruption. All matters raised by any source will be taken seriously and properly investigated.

This policy covers all Wachusett Regional School District employees. Additionally, this policy covers all Wachusett Regional School District vendors, customers and partners to the extent that any Wachusett Regional School District resources are involved or impacted.

Fraud is defined as an intentional deception, misappropriation of resources or the manipulation of data to the advantage or disadvantage of a person or entity. Some examples of fraud include:

- Any dishonest or fraudulent act;
- Forgery or alteration of any document, account or record belonging to the District;
- Forgery or alteration of a check, bank draft, or any other financial document;
- Misappropriation of funds, securities, supplies, or other assets of the District;
- Falsification of expenses and invoices;
- Theft of cash or fixed assets;
- Failure to account for monies collected;
- Accepting or seeking anything of material value from contractors, vendors, or persons providing services/materials to the District (Exception: Gifts less than \$50 in value);
- Destruction, removal, or inappropriate use of records, furniture, fixtures, and equipment; and/or
- Knowingly providing false information on job applications and requests for funding.

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FRAUD PREVENTION POLICY (CONTINUED)

Corruption is defined as the offering, giving, soliciting or accepting of an inducement or reward that may improperly influence the action of a person or entity. Some examples of corruption include:

- Bribery
- Conspiracy
- Extortion

Reporting of Fraud or Corruption

Allegations and concerns about fraudulent or corrupt activity may come from various sources including:

- Employees
- Vendors
- Members of the public
- Results of internal or external audit reviews
- Any other interested parties

All employees and officers have a duty to report concerns they have or information provided to them about the possible fraudulent or corrupt activity of any officer, employee, vendor or any other party with any association with the Wachusett Regional School District. Any person who has a reasonable basis for believing fraudulent or corrupt acts have occurred has a responsibility to report the suspected act immediately and should not attempt to personally conduct investigations or interviews/interrogations related to any suspected fraudulent act.

Concerns should be reported to any of the following:

- Superintendent of Schools
- Director of Operations
- Director of Human Resources
- Director of Student/Information Services
- Business Manager
- Any principal in the Wachusett Regional School District
- Any School Committee Member
- An anonymous Fraud and Corruption Hotline published by the WRSD.

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FRAUD PREVENTION POLICY (CONTINUED)

Retaliation and retribution will not be tolerated against any employee or member of the public who reports suspected fraudulent or corrupt activities. However, if an employee is determined to have acted maliciously or with deceit, the employee will be subject to disciplinary action, up to and including termination.

All reports will be taken seriously and will be investigated by the Superintendent/designee and/or the District Counsel. If deemed necessary, the Wachusett Regional School District will notify and fully cooperate with appropriate law enforcement agencies. Any investigation resulting in the finding of fraud or corruption will be referred to the Wachusett Regional School District Disciplinary Committee for action. The Disciplinary Committee is composed of Wachusett Regional School District's District Counsel, Director of Human Resources, Business Manager and the Superintendent of Schools. Fraudulent or corrupt activities that result in disciplinary action will be reported to the Wachusett Regional School Committee and also to the appropriate state agency (Office of Inspector General, Office of the State Auditor, or Office of the Attorney General).

If the complaint involves the Superintendent of Schools the Chair of the Wachusett Regional School Committee shall establish an Ad-Hoc Subcommittee to review the complaint and recommend possible action by the School Committee.

Detering Fraud and Corruption

The Wachusett Regional School District has established internal controls, policies and procedures in an effort to deter, prevent and detect fraud and corruption.

All new employees, as well as temporary and contract employees, are subject to background investigations including a criminal background check (CORI). The Wachusett Regional School District will also verify all applicants' employment history, education and personal references prior to making an offer of employment.

All vendors, contractors and suppliers must be active, in good standing and authorized to transact business in the Commonwealth of Massachusetts. Vendors, contractors and suppliers, who will be visiting District schools are subject to background investigations including a criminal background check (CORI) and are subject to screening, including verification of the individual's or company's status as a debarred party.

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FRAUD PREVENTION POLICY (CONTINUED)

Wachusett Regional School District employees will receive fraud and corruption awareness training. New employees will receive training as part of New Employee Orientation at the commencement of employment. All employees will receive fraud and corruption awareness training every two years. All employees will receive a copy of this Fraud Prevention Policy.

Corrective Action

Final determination regarding action against an employee, vendor, recipient or other person found to have committed fraud or corruption will be made by the Disciplinary Committee, or the School Committee should the determination involve the Superintendent of Schools.

All employees of the Wachusett Regional School District will be treated equally regardless of their position or years of service with the District. Determinations will be made based on a finding of facts in each case, actual or potential damage to the District, cooperation by the offender and legal requirements.

Depending upon the seriousness of the offense and the facts of each individual case, the Wachusett Regional School District may take action against an employee ranging from a written reprimand and a probationary period to termination of employment. The Wachusett Regional School District may also initiate legal action, either civil or criminal, or both. In all cases involving monetary losses, the Wachusett Regional School District will seek to recover such losses.

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