

Business and Non-Instructional Operations

Accounts

Fraud Prevention and Investigation

The purpose of this policy is to establish certain principles and expectations for the Ledyard Public Schools in order to prevent fraud, investigate and provide consequences for engaging in any manner of fraud, and to heighten awareness of possible fraud, as the Ledyard Public Schools will not tolerate fraud or the concealment of fraud in any manner or fashion.

Definitions:

(a) Fraud includes, but is not limited to, knowingly misrepresenting the truth or concealment of a material fact in order to personally benefit or to induce another to act to his/her detriment.

(b) Actions constituting fraud include but are not limited to:

1. Falsifying, or unauthorized altering of any intermediate unit documents, including, but not limited to:

a. Claims for payments or reimbursements – (including but not limited to submitting false claims for travel, allowable expenses, hourly work, medical claims, or overtime).

b. Absence(s) from the worksite documents, including, but not limited to, requests for sick, bereavement, and other types of leaves of absence.

c. Files (both physical and electronic forms), photographic or audio records, or accounts belonging to the Ledyard Public Schools.

d. Checks, bank drafts, or any other financial documents.

e. Student records.

f. Personnel records.

g. Board minutes or other Board records.

h. Business office records.

i. Maintenance records.

j. Fire, health, and safety reports.

k. Other Ledyard Public School records.

2. Accepting or offering a bribe, gifts, promises, or other favors under circumstances that indicate that the gift or favor was intended to influence an employee's decision-making.

3. Disclosing to other persons the purchasing/bidding activities engaged in, or contemplated, by Ledyard Public Schools in order to give any entity, person, or business an unfair advantage in the bid process.

4. Causing Ledyard Public Schools to pay excessive prices or fees where justification is

not documented.

5. Unauthorized destruction, theft, tampering, or removal of records, furniture, fixtures, or equipment. Approval by the Superintendent and/or his/her designee, with proper documentation, is required for the removal of Ledyard Public Schools property or assets.

6. Using Ledyard Public Schools equipment or work time for any outside private business activity.

Responsibility:

(a) This policy applies to any fraud, suspected or observed, involving Ledyard Public Schools staff members, outside support organizations, vendors, contractors, volunteers, and/or outside agencies doing business with Ledyard Public Schools and any other persons or parties in a position to commit fraud against Ledyard Public Schools. Any investigation required shall be conducted without regard to the suspected wrongdoer's length of service, position/title, or relationship.

(b) Any perceived fraud that is detected or suspected by any staff member or other person shall be reported immediately to the Superintendent or Board for guidance as to whether pursuit of an investigation is warranted. The obligation to report fraud includes instances where an employee knew or should have known that an incident of fraud occurred.

(c) Administrators and supervisors are responsible for:

1. Ascertaining that employees under their supervision receive training regarding fraud.
2. Completing a self-assessment of risk of fraud for their school/department
3. Being familiar with the types of fraud that could occur within their areas of responsibility.
4. Being alert for any indication of fraud.

Consequences:

Violation of this policy may result in disciplinary action, including discharge, and prosecution based on a full investigation of all factors and circumstances.

Employee Education:

(a) All current employees will be required to sign a statement indicating that they have read and understand this policy.

(b) All new employees will be required to sign a statement indicating that they have read and understand this policy as part of their orientation.

(c) Ledyard Public Schools will periodically train employees and measure their understanding of this policy.

Self-Assessment of Risk of Fraud:

At the direction of the Superintendent and with the assistance of the Business Manager, each program/department shall perform a self-assessment of risk to identify areas where fraud may occur. Administrators and supervisors are responsible for identifying risks in their particular area of oversight and ensuring that internal controls are in place to address each of the identified risks.

Confidentiality:

To the extent possible, the Ledyard Public Schools will maintain the confidentiality of employees who suspect fraud and report the same under this policy with the understanding that employees accused of fraud will be afforded all applicable due process.

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LEDYARD PUBLIC SCHOOLS
Ledyard, Connecticut