

The Workforce Connection, Inc.
Policy Title: Whistleblower/Fraud

Reference Number 2021-100-05

Approved:	12/07/2021
Effective:	12/07/2021
Status:	Active

Purpose

The purpose of the whistleblower/fraud policy is to protect the interest of The Workforce Connection Inc. (TWC) as a public body charged with oversight of federal and state funds and to create a process for TWC Board staff to report any concerns regarding potential fraud within the organization and to provide protections after reporting alleged fraud.

Reporting Responsibility

It is the responsibility of all TWC employees to disclose serious breaches of conduct covered by TWC policies and all applicable local, state and federal laws.

Definition of Fraud

The Workforce Connection, Inc. defines fraud under the following parameters:

- Embezzlement or other financial regularities
- Fraudulent/gross misuse of TWC property, resources or authority
- Theft, misappropriation, destruction, removal or concealment of TWC resources
- Forgery, falsification, or alteration of documents
- Improprieties/misrepresentation in the handling or reporting of money or financial transactions
- Authorizing or receiving payment for goods not received or services not performed
- Accepting or offering bribes, kickbacks or rebates
- Actions relating to concealing or perpetuating above mentioned activities

Staff members acting on behalf of TWC have a general duty to conduct themselves in a manner that will maintain and strengthen the public's trust and confidence in the integrity of TWC and takes no actions incompatible with their obligations to TWC. Staff are responsible for safeguarding TWC resources and ensuring they are used only for authorized purposes, in accordance with TWC policies and applicable laws.

No Retaliation

No employee who in good faith reports fraudulent activities shall be exposed to or suffer harassment, retaliation or adverse employment consequence. Any employee who retaliates against someone who has reported fraud in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable

employees and to raise serious concerns within the organization prior to seeking resolution outside of the organization.

Reporting Violations

Employees should share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with their supervisor or they are not satisfied with their supervisor's response, they are encouraged to speak with the Equal Opportunity Officer (EOO). If an employee is not comfortable with speaking to the EOO, or is not satisfied with their response, the employee should take their concerns to the Finance Committee Chair. Supervisors are required to report allegations of fraud to the TWC Equal Opportunity Officer who has the responsibility to investigate all reported violations.

Equal Opportunity Officer

TWC EOO is responsible for investigating and resolving all reported complaints and allegations concerning violations of the code of conduct and will advise the Board Executive Director, Board Chair, and Board Finance Committee Chair of any actions that should be taken.

Accounting and Auditing Matters

The Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding accounting practices, internal controls or auditing. The EOO shall immediately notify the Finance Committee Chair of any such complaint and work with the Finance Committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning alleged fraud must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a fraudulent act. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Handling of Reported Violations

The EOO will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.