

## **Business and Non-Instructional Operations**

### **Accounts**

### **Fraud Prevention and Investigation**

The Board expects all employees, board members, consultants, vendors, contractors, and other parties maintaining a business relationship with the District to act with integrity and due diligence in duties involving the District's fiscal resources.

The Superintendent or his or her designee shall be responsible for developing internal controls which aid in the prevention and detection of fraud, financial impropriety or irregularity within the District. Each member of the management team shall be alert for any indication of fraud, financial impropriety, or irregularity within his or her areas of responsibility.

An employee who suspects fraud, impropriety or irregularity shall immediately report the suspicions to his or her immediate supervisor and/or the Superintendent or designee. The Superintendent or designee shall have primary responsibility for any necessary investigations, in coordination with legal counsel and other internal or external departments and agencies as appropriate.

(cf. 3100 – Budget/Budgetary System)

(cf. 3300 – Expenditures/Expending Authority)

(cf. 3324.1 – Contracts)

(cf. 3430 – Periodic Financial Reports)

(cf. 3434 – Periodic Audit)

## **Business and Non-Instructional Operations**

### **Accounts**

### **Fraud Prevention and Investigation**

Fraud, financial improprieties or irregularities include, but are not limited to:

1. Forgery or unauthorized alteration of any document or account belonging to the District.
2. Forgery or unauthorized alteration of a check, bank draft or any other financial document.
3. Misappropriation of funds, securities, supplies or other assets.
4. Impropriety in the handling of money or reporting of financial transactions.
5. Profiteering as a result of insider information of District information or activities.
6. Disclosing confidential and/or proprietary information to outside parties.
7. Accepting or seeking anything of material value from contractors, vendors, or persons providing services to the District.
8. Destroying, removing or inappropriately using of records, furniture, fixtures or equipment.
9. Failing to provide financial records to authorized state or local entities.
10. Any other dishonest or fraudulent act.

The Superintendent or designee shall investigate reports of fraudulent activity in a manner that protects the confidentiality of the parties and the facts. All employees involved in the investigation shall be advised to keep information about the investigation confidential.

If an investigation substantiates the occurrence of a fraudulent activity, the Superintendent or designee shall issue a report to appropriate personnel and to the Board of Education. The final disposition of the matter and any decision to file a criminal complaint or to refer the matter to the appropriate law enforcement and/or regulatory agency for independent investigation shall be made in consultation with legal counsel. The result of the investigation shall not be disclosed to or discussed with anyone other than those individuals with a legitimate right to know.

All district employees with financial and accounting responsibilities, including handling cash, shall sign form 3435 to acknowledge their responsibilities to the district.

Regulation approved: September 22, 2005

NEW LONDON PUBLIC SCHOOLS  
New London, Connecticut

**New London Public Schools  
New London, Connecticut**

**Code of Conduct and Ethical Behavior**

*(for employees with financial and/or accounting responsibilities)*

As an employee of the District and recognizing the trust placed in me by the elected representatives of the community, I agree to adhere to the following:

1. Recognize the Board's intent that the District operate in a culture of honesty and ethical behavior and to do all in my power to further that goal;
2. Comply with all laws, rules, regulations and court orders of the State of Connecticut and of the United States, as well as Board policy addressing conflicts of interest and other fiscal matters;
3. Practice good stewardship of the District's financial property resources, including reporting of fraudulent expenditures;
4. Support and follow sound business practices to the best of my ability and in keeping with job-related training;
5. Maintain and protect all District financial records;
6. Perform my job with the highest attention to detail to minimize and prevent error, falsification of accounting records, and omission of transactions;
7. Report knowledge of fraud or suspected fraud, including intentional misstatements and omissions of amounts or disclosures;
8. Guard against misappropriation of assets, particularly theft of the District's assets; and
9. Resist incentives, pressures, and negative attitudes that detract from performance of my responsibilities.

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Position*

\_\_\_\_\_  
*Date*

*It is recommended that each employee with financial/accounting responsibilities sign this document. The signed document is to be placed in the employee's personnel file.*