

## ANTI-FRAUD POLICY AND ORGANIZATIONAL CODE OF CONDUCT

### **Introduction**

The policy's main purpose is to prevent, detect, and investigate fraud and abuse. The District is committed to upholding the Rhode Island general law R.I.G.L § 36-14-1 et seq., known as the Rhode Island Code of Ethics in government and ethical conduct. Employees must always comply with all laws and regulations, avoiding illegal acts, bribes, and personal benefits. Any action that cannot withstand public scrutiny is prohibited.

Fraud and abuse are sensitive and damaging issues which can lead to financial loss, bad publicity and loss in public confidence in the way public funds are being used. It is therefore important that the District has appropriate systems and procedures in place to ensure that the risk of impropriety is minimized, and that where instances do occur, there is a prompt and effective response to them.

All business conduct should be above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing the District's operations.

Anyone uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor, who, if necessary, should seek the advice of the Superintendent.

### **General Employee Conduct**

The District has established a set of rules and regulations that apply to all employees (See GBCC-R). These guidelines, while neither exhaustive nor all-inclusive, are intended to outline expectations for professional behavior and provide examples of conduct that will not be tolerated. Employees are expected to adhere to these standards at all times, recognizing that the list serves as a representative guide rather than a complete catalog of unacceptable actions.

### **Conflicts of Interest**

All employees must adhere to the highest standards of ethical conduct, respect the public trust and the rights of all persons, be open, accountable and responsive, avoid the appearance of impropriety and not use their position for private gain or advantage. The School District shall comply with R.I.G.L § 36-14-1 et seq., known as the Rhode Island Code of Ethics in government. Reports of perceived conflicts should be communicated to their supervisor, who, if necessary, should seek the advice of the Superintendent.

## **Outside Activities, Employment, and Directorships**

All employees share a serious responsibility for the District's positive public relations, especially within the local community. Their readiness to help with religious, charitable, educational, and civic activities brings credit to the District and is encouraged. Employees must, however, avoid acquiring any business interest or participating in any other activity outside the District that would, or would appear to:

- Create an excessive demand on their time and attention, thus depriving the District of their best efforts on the job
- Create a conflict of interest -an obligation, interest, or distraction- that may interfere with the independent exercise of judgment in the District's best interest

## **Relationships With Vendors and Suppliers**

Employees must avoid any financial or personal interests that could influence, or appear to influence, their judgment in conducting District business. No employee may take part in awarding or administering a contract where a conflict of interest exists, including ties involving themselves, immediate family members, business partners, or organizations with which they or their families are employed or have financial connections.

## **Gifts, Entertainment, and Favors**

Employees must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, decisions in favor of any person or organization with whom or with which the District has, or is likely to have, business dealings. Similarly, employees must not accept any other preferential treatment under these circumstances because their position with the District might be inclined to, or be perceived to, place them under obligation.

## **Kickbacks and Secret Commissions**

No employee should knowingly and willingly solicit or receive any remuneration (including any kickback, bribe, or rebate) of any kind. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

## **District Funds and Other Assets**

Employees who have access to District funds in any form must follow the prescribed procedures for recording, handling, and protecting the funds as detailed in the financial internal controls & procedures or other explanatory materials, or both. The District imposes strict standards to prevent fraud and dishonesty, and to protect employees from false accusations. If employees become aware of any evidence of fraud or abuse, they should immediately advise their supervisor and or the Superintendent so that the District can promptly investigate the matter further.

District funds and all other assets and resources of the District are for District purposes only and not for personal benefit. This includes the personal use of District assets, such as tools and computers, and the use of District purchasing arrangements and charge accounts, even if personally reimbursed.

### **Accuracy & Integrity of Records**

Employees must not make or engage in any false or misleading records or communication of any kind, whether internal or external. This includes, but not limited to: falsifying expense, attendance, or production reports, submitting inaccurate statements, engaging in false or deceptive advertising practices, or any other misleading representations on behalf of the District.

### **Communicating**

Employees must take care to separate their personal roles from their District positions when communicating on matters not involving District business. Employees must not use District identification, stationery, supplies, and equipment for personal or political matters.

When communicating publicly on matters that involve District business, employees must not presume to speak for the District on any topic, unless they are certain that the views they express are those of the District, and it is the District's desire that such views be publicly disseminated. Employees should refer to Social Media Policy GBEBD

When dealing with anyone outside the District, including public officials, employees must take care not to compromise the integrity or damage the reputation of either the District, or any outside individual, business, or governmental body.

### **Privacy and Confidentiality**

When handling financial and personal identifiable information (PII) the following principles will be observed:

1. Collect, use, and retain only the personal information necessary for the District's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
2. Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
3. Limit internal access to personal information to those with a legitimate business purpose for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally

disclosing any personal information, unless legal process or contractual obligation provides otherwise.

Adopted: September 25, 2006

Revised: October 14, 2025

Cross Ref: BGEB Staff Conduct, GBEBD Employee Use of Social Networking Apps. Services and Websites

Legal Reference: R.I.G.L § 36-14