

## FRAUD PREVENTION POLICY

Marlboro School District

It is the policy of the Marlboro School Board to provide a mechanism for employees and officers to bring to the attention of the auditors [the public accountant contracted by the Marlboro School District] any complaints regarding the integrity of the Marlboro School District's internal financial controls or the accuracy or completeness of financial or other information used in or related to the Marlboro School District's financial statements and reports. The Marlboro School District's employees and officers shall not be discharged, demoted, suspended, threatened, harassed, or discriminated against in any manner for raising reasonable questions concerning the fair presentation of the Marlboro School District's financial statements in accordance with this policy.

### Procedures

E12-R

#### REPORTS OF IRREGULARITY

Any employee who has a complaint regarding the integrity of the Marlboro School District's internal financial controls or the accuracy or completeness of financial or other information used in or related to the Marlboro School District's financial statements and reports, or who observes any questionable accounting practices, should report such complaint to the auditors [the public accountant contracted by the Marlboro School District Board].

The report should include a description of the matter or irregularity, the period of time during which the employee observed the matter or irregularity, and any steps that the employee has taken to investigate the matter or irregularity, including reporting it to a supervisor and the supervisor's reaction. The report may include, at the employee's option, the employee's contact information if additional information is needed. However a report shall not be deemed deficient because the employee did not include contact information.

Examples of reportable actions include any indication of fraud, misappropriation of the Marlboro School District's resources, substantial variation in the Marlboro School District's financial reporting methodology from prior practice or from generally accepted accounting principles, and the falsification, concealment, or inappropriate destruction of the Marlboro School District's financial records.

#### INVESTIGATION

Upon receiving such a report, the Marlboro School District auditors [the public accountant contracted by the Marlboro School District Board] shall investigate the issues identified in the report. The Marlboro School District auditors [the public accountant contracted by the Marlboro School District Board] may consult with the Board, Superintendent, treasurer, any other the Marlboro School District or WCSU employee, and legal counsel as a part of their investigation. At the conclusion of the investigation, the Marlboro School District auditors [the public accountant contracted by the Marlboro School District Board] shall prepare a written response to the report.

*Warned: 4-2-12*

*Adopted: 5-7-12*