

FRAUD PREVENTION POLICY

Windham Central Supervisory Union

It is the policy of the WCSU Board to provide a mechanism for employees and officers to bring to the attention of the auditors [the public accountant contracted by the Windham Central Supervisory Union Board] any complaints regarding the integrity of the Windham Central Supervisory Union's (WCSU) internal financial controls or the accuracy or completeness of financial or other information used in or related to the WCSU's financial statements and reports. WCSU'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 WCSU financial statements in accordance with this policy.

Procedures

E12-R

REPORTS OF IRREGULARITY

Any employee who has a complaint regarding the integrity of the WCSU's internal financial controls or the accuracy or completeness of financial or other information used in or related to the WCSU'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 WCSU 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 WCSU resources, substantial variation in the WCSU's financial reporting methodology from prior practice or from generally accepted accounting principles, and the falsification, concealment, or inappropriate destruction of WCSU financial records.

INVESTIGATION

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

Warned: May 18, 2011

Adopted: August 24, 2011