

SUSPECTED MISCONDUCT AND DISHONESTY

Purpose.

The purpose of this policy is to communicate Southwest Wisconsin Workforce Development (SWWDB) policy regarding the reporting, deterrence and investigation of suspected misconduct and dishonesty by employees and others doing business with SWWDB. This policy also provides specific directions regarding appropriate investigative responsibilities and actions in case of suspected violations.

Policy.

The Southwest Wisconsin Workforce Development Board (SWWDB) shall immediately report and investigate any suspected acts of misconduct or dishonesty by employees or other persons or agencies doing business with SWWDB. For purposes of this policy, misconduct and dishonesty include but are not limited to:

- Acts which violate the organization's Code of Conduct.
- Theft or other misappropriation of assets, including assets of the company, our customers, or others with whom we have a business relationship.
- Misstatements and other irregularities in company records, including the intentional misstatement of the results of operations.
- Wrongdoing.
- Forgery or other alteration of documents.
- Fraud and other unlawful acts.
- Any similar acts.

It is the responsibility of every employee to immediately report suspected misconduct or dishonesty to his or her supervisor. If suspected misconduct or dishonesty involves an employee's immediate Supervisor, the allegation shall be reported to the Executive Director. Managers shall communicate his or her suspicions directly to the Executive Director, or the SWWDB Board Chair if the suspicions involve the Executive Director.

Supervisory personnel have the additional responsibility to deter and/or detect incidents of misconduct and dishonesty. In addition to reporting suspected violations, supervisory personnel also have the responsibility to:

- Become aware of what can go wrong in his/her area of responsibility.
- Establish and sustain monitoring, review, and control procedures that prevent acts of wrongdoing.
- Institute and maintain monitoring, review, and control procedures that will detect acts of wrongdoing promptly, should prevention efforts fail.

The Executive Director/SWWDB Board Chair shall have primary responsibility to investigate all suspected incidents involving SWWDB personnel or agencies doing business with SWWDB. The Executive Director/SWWDB Board Chair may request the assistance of internal auditing in any investigation, including access to internal auditing periodic examinations and evaluation of internal controls.

Due to the important yet sensitive nature of the suspected violations, the Executive Director/SWWDB Board Chair shall determine the most appropriate process for investigating the matter and designate an investigation team to conduct a probe into the matter. All investigations of alleged wrongdoing will be

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conducted in accordance with applicable laws and SWWDB procedures. The investigative team will have:

- Free and unrestricted access to all SWWDB records and premises.
- The authority to examine, copy and/or remove all or any portion of the contents of files, desks, cabinets, and other storage facilities (whether in electronic or other form), without the prior knowledge or consent of any individual who might use or have custody of any such items or facilities, when it is within the scope of investigative or related follow-up procedures.

References: • Policy on Suspected Misconduct and Dishonesty sample from Wifli Young, LLC

Policy Adopted: June 9, 2004

Policy Revised: