



**WHISTLEBLOWER
& FRAUD PREVENTION
HOTLINE POLICY**

ADMINISTRATIVE POLICY MANUAL
Section 1.3 – Miscellaneous

Approval: *Curtis R. Fandino*
City Administrator

Effective Date: May 2021

Responsible Department: Human Resources Dept.

PURPOSE

The City of Vernon requires employees to observe the highest standard of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the City, all employees must practice honesty and integrity in the fulfillment of their responsibilities and compliance with all applicable laws and regulations. Further, the City must protect its assets and resources from fraudulent, illegal, and dishonest activities by maintaining effective internal controls and by identifying and investigating any possibility of fraud or other improper activities. To that end, this Whistleblower & Fraud Prevention Hotline Policy establishes procedures for City employees to report alleged financial fraud, waste or abuse by City employees and/or contractors, and to assure that such reports do not result in retaliation.

POLICY

City employees are encouraged to report good faith suspicions of financial misconduct by City employees or contractors, and any misuse of City property or resources. Any City employee who makes such a good faith report is protected against adverse employment actions by the City for raising such allegations, and shall not suffer any reprisals or retaliation by the City for making the report, whether or not the allegations are sustained.

REPORTABLE ACTIVITIES

Employees should report information related to financial fraud, waste, or abuse, including the following prohibited activities:

1. Violation of any law, regulation, ordinance.
2. Conflict of interest.
3. Fraud, waste, or misuse of City property, resources, or time.
4. Theft, misuse of, or misappropriation of City resources, property, information, assets or funds, or an attempt to do any of the same.
5. Intentional falsification of records (including failure to disclose material facts or making of false or misleading entries or statements with the intent to deceive on any City document or other official document, report, or form, including but not limited to, City financial records and environmental regulatory reporting), or the willful and unauthorized destruction and/or mutilation of any City document or other official document, report, or form, including City financial records.
6. Intentionally submitting false claims for payment or reimbursement.
7. Knowingly submitting and/or signing a timesheet that contains false information.
8. Forgery or intentional unauthorized alteration of a City document or other official document, application, report, or form, including but not limited to, City financial documents.
9. Improprieties in the handling or reporting of financial transactions for the City.
10. Authorizing or receiving payment by the City for goods not received or services not performed.
11. Computer-related activity involving unauthorized access, destruction of data, forgery, or manipulation of data or misappropriation of City-owned data or software.

HOW TO REPORT

City employees who have specific information that other City employees or contractors have engaged in fraud, waste or abuse are encouraged to report such information through the normal chain of command, which includes their immediate superior, department head, Human Resources, and the City Administrator's or City Attorney's Office.

Face to face reporting through the chain of command is always the best form of communication, however, there may be certain circumstances where an employee wishes to remain anonymous. Recognizing that employees are not always comfortable going through the chain of command, the Fraud Prevention Hotline is another way to report fraud, waste, or abuse. The Fraud Prevention Hotline is hosted by an independent, third-party provider contracted by the City. The Fraud Prevention Hotline provides an anonymous method of reporting such incidents over the phone to a third-party interviewer, or via an anonymous web form.

To contact the Fraud Prevention Hotline, employees should call (844) 864-6371 or by accessing the employee URL at <http://cityofvernon.ethicspoint.com>

All reports regarding fraud, waste, or abuse should be made seriously and with due professional care. The Fraud Prevention Hotline should not be used for employment-related grievances or appeals, as existing City policy and procedures provide channels for resolution of these issues.

INVESTIGATION

All reports will be reviewed and analyzed. Appropriate corrective action will be taken, if necessary, and findings will be communicated to the reporting person. Investigations may warrant involvement of independent persons such as auditors and/or outside attorneys.

For reports made through the Fraud Prevention Hotline, the third-party provider will complete an incident report and send the report to the City Attorney's Office. The City Attorney's Office will coordinate the investigation of all complaints related to fraud, waste, and abuse.

EMPLOYEE PROTECTION

The Whistleblower & Fraud Prevention Hotline Policy is intended to encourage and enable employees to raise concerns. No City officer or employee shall use or threaten to use any official authority to cause any adverse employment action as retaliation against any employee who acts as a whistleblower in good faith and with reasonable belief that improper conduct has occurred, even if the report is mistaken. However, this Policy does not prohibit the City from taking an adverse action for legitimate or non-discriminatory reason due to a mere causal connection to the protected Whistleblower activity.