

Title: Administrative Policy AlertLine: Financial and Ethics Fraud Hotline Policy	Policy No. Part 5, Staff Policies Chapter 1, Rules Section 11
Policy Custodian Finance	Effective Date December 15, 2020 Adoption/Revision Date December 15, 2020

Adopting Resolution(s): CC20-358

References (Statutes/Resos/Policies): Alertline: Financial and Ethics Fraud Hotline Procedures Orders

Purpose: To support the detection and prevention of fraud, misappropriations, and other irregularities by establishing a reporting service (the “AlertLine”), guidelines for reviewing and investigating such allegations, and responsibilities for employees.

A. Establishment of Alertline

1. The County shall maintain a Fraud Hotline that permits County employees to anonymously report allegations of potential theft, misappropriation or misuse of County assets, bribery or corruption, false accounting or financial reporting, or other types of financial misconduct or fraud (collectively, “Fraud”) involving County employees or officials and/or County assets.

2. Protection from Retaliation

No retaliation of any kind shall be permitted against County employees who report allegations of suspected Fraud or cooperate with Fraud investigations in good faith.

B. Review and Investigation of Reported Misconduct

1. The County shall designate a team of qualified staff members (the “Financial and Ethics Fraud Team”) to review and investigate allegations of Fraud reported through the AlertLine Hotline. At a minimum, the Financial and Ethics Fraud Team shall include representatives from the County Attorney’s Office, Human Resources department, and Strategy, Innovation and Finance department, preferably with education or experience in accounting, auditing, financial management, fraud investigation, or related fields.

2. Access to AlertLine reports shall be limited to the members of the Financial and Ethics Fraud Team and such other individuals as are authorized by the Financial and Ethics Fraud Team to access such reports for the purposes permitted by this policy.

3. Financial and Ethics Fraud Team investigations shall be conducted in accordance with all applicable County policies and procedures and the recommendations of the County Attorney's Office.
4. To the maximum extent possible, the Financial and Ethics Fraud Team shall use care to maintain the security and confidentiality of all investigations. Financial and Ethics Fraud Team members shall only disclose the content of pending or concluded investigations with persons who have a legitimate, compelling reason to know such information.
5. The Financial and Ethics Fraud Team may delegate specific Fraud investigation responsibilities to other County employees or contractors when the Financial and Ethics Fraud Team determines, in its discretion, that such delegation is appropriate under the circumstances and will further the investigation. In the event of such delegation, the delegate shall be bound by the security and confidentiality obligations set forth in this Policy.

C. Fraud Prevention

1. Management Responsibilities

- a. Managers are responsible for establishing and maintaining a sound system of internal control that supports the detection and prevention of fraud, misappropriations, and other irregularities and managing the financial risks that the County faces. This includes:
 - 1) Preventing and detecting Fraud as much as possible.
 - 2) Assessing the types of financial risk involved in the operations for which they are responsible.
 - 3) Reviewing the control systems for which they are responsible regularly.
 - 4) Ensuring that controls are being complied with and their control systems continue to operate effectively; and
 - 5) Where prior instances of Fraud have occurred, implementing new controls to close loopholes, recommending changes to this Policy, providing employee training, and taking other actions to reduce the risk of similar instances of Fraud in the future.

2. Individual Employee Responsibilities

- a. Employees are expected to:
 - 1) Review all AlertLine training video(s) and material(s) provided by the County.
 - 2) Act with propriety in the use of the County's resources and the handling and use of funds whether they are involved with cash, receipts, payments or dealing with suppliers.

- 3) Conduct themselves with integrity, objectivity, accountability, openness and honesty.
- 4) Be alert to unusual events or transactions that could be indicators of Fraud.
- 5) Alert their manager when they believe the controls are not adequate to detect or prevent Fraud (e.g. because of poor procedures or lack of effective oversight).
- 6) Report all suspected Fraud involving County employees or officials and/or County property or assets to the AlertLine.
- 7) Cooperate fully with all Fraud investigations.