

# WELLESLEY HOUSING AUTHORITY

## FRAUD POLICY

Scope of Policy: This policy sets forth what constitutes fraudulent activities. This policy pertains to all WHA employees.

Definitions and Examples of Fraud, Waste and Abuse – Below are examples of the most serious of these activities, which may include, but are not limited to the following:

- Bribery or kickbacks
- False claims or bid rigging
- Theft, embezzlement or misappropriation of assets (including the personal use of an Authority credit card)
- Forgery or alteration of documents
- Impropriety with respect to financial transactions
- Destruction or concealment of records or assets
- Deceptive accounting practices, internal controls and auditing
- In appropriate circumstances, conduct violative of G.L. c. 268A, the Massachusetts Conflict of Interest Law, may also constitute conduct amounting to fraud, waste or abuse

Responsibility to Report Suspected Fraud – It is the responsibility of all commissioners and employees to report ethics violations or suspected fraud violations in accordance with this Policy. Where fraud or related criminal activity, such as described above, is suspected, the activity should be reported to the Executive Director, the Board of Directors, to officials at DHCD or other enforcement authorities, as appropriate.

Reporting Violations - WHA has an “open door” policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the Executive Director of WHA is in the best position to address an area of concern. However, if you are not comfortable speaking with the Executive Director or you are not satisfied with the Executive Director’s response, you are encouraged to speak with a member of the Board of Commissioners. The Executive Director is required to report suspected ethics or fraud violations to WHA’s Board of Commissioners.

For suspected fraud, waste or abuse, or when you are not satisfied or uncomfortable with following WHA’s open door policy, individuals should contact the Board of Commissioners. Employees suspecting fraud should report it and not attempt an investigation. Management and others should refrain from discussing the allegations with anyone other than those with a legitimate need to know. WHA’s Board of Commissioners is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at their discretion shall advise the Executive Director.

No Retaliation - No director, officer or employee who, in good faith, reports an ethics or fraud violation shall suffer harassment, retaliation or adverse employment consequences. This Policy is intended to encourage and enable employees and others to raise serious concerns within WHA prior to seeking resolution outside the organization

Other Irregularities – Allegations of personal improprieties or other irregularities, not constituting fraud or criminal activity, should be resolved by the Executive Director.

Acting in Good Faith - Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Handling of Reported Violations - The Board of Commissioners will notify the sender and acknowledge receipt of the reported violation or suspected violation within ten (10) business days. All reports will be promptly investigated and appropriate corrective action will be taken, if warranted by the investigation.

Disciplinary Action – Any recommendations to take disciplinary action, including the termination of employees, should be reviewed by counsel and the Executive Director.

Confidentiality – Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Any investigation resulting from suspected irregularities generally will not be disclosed to outsiders, except to the appropriate law enforcement authorities and DHCD, if necessary.

Adopted by the Board of Commissioners on April 28, 2016