

TOWN OF GREENVILLE, FLORIDA

Anti-Fraud Policy

I. PURPOSE

The purpose of this Anti-Fraud Policy is to establish a framework for preventing, detecting, and responding to fraud within the Town of Greenville, FL. This policy applies to all councilmembers, charter officers, employees, and independent contractors. It underscores the Town's commitment to integrity, accountability, and transparency in its operations.

II. SCOPE

This policy applies to all Town councilmembers, charter officers, employees, and independent contractors, regardless of their position or length of service. It covers any suspected fraudulent activity, including but not limited to theft, embezzlement, bribery, corruption, misappropriation of funds, and falsification of records.

III. DEFINITIONS

A. Fraud: Any intentional act or omission designed to deceive others, resulting in the victim suffering a loss and/or the perpetrator achieving a gain. Examples include but are not limited to the following:

1. Theft or misappropriation of Town assets.
2. Forgery or alteration of documents and records.
3. Unauthorized use of Town funds, property, or resources.
4. Corruption or bribery.
5. Falsification of financial or operational records.
6. Failure to account for moneys collected.

B. Corruption: The abuse of public office or entrusted power for personal gain or benefit. Corruption undermines the integrity, transparency, and effectiveness of governmental operations and erodes public trust in municipal governance. Examples include but are not limited to the following:

1. Bribery.
2. Extortion.
3. Fraud.
4. Embezzlement.

5. Nepotism.

6. Favoritism.

7. Any other illegal or unethical behavior where a public official or employee misuses their position, influence, or authority to achieve an improper advantage for themselves or others.

C. Employee: Any individual employed by the Town of Greenville, including full-time, part-time, temporary, and contractual employees.

D. Independent Contractor: Any individual or entity engaged by the Town under a contract to perform services.

IV. RESPONSIBILITIES

A. Councilmembers and Charter Officers:

1. Ensure that the Town maintains a culture of ethical behavior and compliance with all laws and regulations.

2. Monitor and review financial and operational controls to detect and prevent fraud.

3. Report any suspected fraudulent activity in accordance with this policy.

B. Employees:

1. Perform duties with integrity and honesty.

2. Be vigilant and report any suspected fraud immediately to a supervisor or the Town Manager.

3. Cooperate fully with any investigations into fraudulent activities.

C. Independent Contractors:

1. Conduct business with the Town in an ethical manner and in compliance with all contractual obligations.

2. Report any suspected fraud or unethical behavior to the Town Manager or designated contact.

3. Cooperate fully with any investigations into fraudulent activities.

V. REPORTING FRAUD

A. Mandatory Reporting:

1. All councilmembers, charter officers, employees, and independent contractors are required to report any suspected fraud, corruption, or other dishonest activities immediately upon discovery.

2. Reports of fraud can be made to the Town Manager, or anonymously through a designated reporting mechanism (e.g., a fraud hotline or secure email).

a. In cases where allegations of fraud are made against the Town Manager, individuals may report fraud directly to the Town Clerk or Town Attorney.

B. Confidentiality:

1. All reports of fraud will be treated confidentially to the extent possible, consistent with the need to conduct an adequate investigation and comply with applicable laws.

2. The identity of the individual reporting fraud will be protected, and retaliation or retribution against any individual who reports fraud in good faith is strictly prohibited.

C. Investigation:

1. The Town Manager or designee is responsible for investigating all reports of suspected fraud. This may include engaging external auditors or investigators if necessary.

a. In cases where allegations of fraud are made against the Town Manager, the Town Clerk or Town Attorney shall be responsible for investigating the allegations, which may include engaging external auditors or investigators if necessary.

2. No attempt shall be made by anyone other than those authorized to personally conduct investigations, interviews, or interrogations related to any suspected fraudulent act.

3. All investigations will be conducted promptly, thoroughly, and impartially.

4. If the investigation substantiates that fraudulent activity has occurred, appropriate disciplinary action will be taken, up to and including termination of employment or contract and legal action if warranted.

5. When an investigation is in response to an allegation of fraud by a charter officer, the findings of the investigation shall be presented to the Town Council at the first scheduled meeting following the completion of the investigation.

D. Bad Faith Complaints:

1. If a reporter of fraud is determined to have acted maliciously or with deceit, the individual will be subject to disciplinary action.

VI. PREVENTION AND DETECTION

A. Internal Controls:

1. The Town shall establish and maintain robust internal controls to prevent and detect fraud. This includes regular audits, segregation of duties, and other financial and operational controls.

2. Department heads are responsible for ensuring that effective internal controls are in place within their areas of responsibility.

3. All contractual agreements with the Town of Greenville will contain a provision prohibiting fraudulent or corruptive acts and will include information about reporting fraud and corruption.

4. Bid packages shall have a statement requiring non-collusion.

5. New councilmembers will receive a copy of the anti-fraud policy prior to taking office. New charter officers and employees will receive a copy of the anti-fraud policy as part of orientation at the commencement of employment. Independent contractors will receive a copy of the anti-fraud policy prior to commencing work on behalf of the Town of Greenville.

B. Training:

1. The Town will provide regular training to all employees and independent contractors on the importance of fraud prevention, detection, and reporting.

2. Training will include information on how to recognize signs of fraud and the proper procedures for reporting suspected fraudulent activities.

C. Background Checks:

1. All new employees, including temporary and contract employees, shall be subjected to background investigations, including a criminal background check.

2. The Town will also verify all applicants' employment history, education, and personal references prior to making an offer of employment.

VII. CONSEQUENCES OF FRAUD

A. Disciplinary Action:

1. Employees found to have committed fraud will face disciplinary action, up to and including termination of employment, legal action, and referral to law enforcement for prosecution.

2. Independent contractors found to have committed fraud will face termination of their contract, legal action, and referral to law enforcement for prosecution.

B. Restitution:

1. The Town will seek restitution for any losses incurred as a result of fraudulent activity.

VIII. MONITORING AND REVIEW

A. Oversight:

1. The Town Manager is responsible for overseeing the implementation of this Anti-Fraud Policy and ensuring compliance with its provisions.

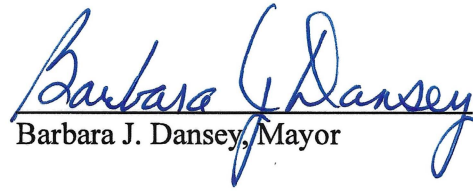
2. The Town Council will review the effectiveness of this policy annually and make any necessary revisions to strengthen its anti-fraud measures.

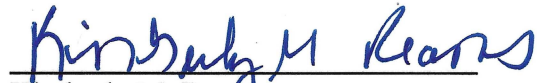
B. Review and Update:

1. This policy will be reviewed annually and updated as needed to reflect changes in laws, regulations, and best practices.

IX. EFFECTIVE DATE

This policy shall become effective immediately upon its passage and shall remain in effect until amended or repealed.


Barbara J. Dansey, Mayor


Kimberly M. Reams
Custodian of Records

<u>ACTION</u>	<u>SECTION(S) AMENDED</u>	<u>RESOLUTION #</u>	<u>DATE</u>
Adoption	n/a	2024-15	09/09/2024