



Fraudulent or Dishonest Conduct & Whistleblower Policy Statement

The Jewish Community Center of Metropolitan Detroit (the Center) will investigate any possible fraudulent or dishonest use or misuse of Center resources or property by management, staff, volunteers, or members. Any employee found to have engaged in fraudulent or dishonest conduct is subject to disciplinary action by the Center up to and including dismissal and/or civil or criminal prosecution. Non-employees who have engaged in fraudulent or dishonest conduct are subject to civil or criminal prosecution and/or institutional disciplinary action.

All members of the Center community are encouraged to report possible fraudulent or dishonest conduct. An employee should report his or her concerns to a supervisor or director. If for any reason an employee finds it difficult to report his or her concern to a supervisor or director, the employee can report it directly to the Executive Director.

Supervisors or directors are required to report suspected fraudulent or dishonest conduct to the Executive Director.

For more information about definitions, rights and responsibilities, procedures, and contacts read the following.

Definitions

Baseless Allegations: allegations made with reckless disregard for their truth or falsity. People making such allegations may be subject to institutional disciplinary action and /or legal claims by individuals accused of such conduct.

Fraudulent or Dishonest Conduct: a deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- forgery or alteration of documents
- unauthorized alteration or manipulation of computer files
- fraudulent financial reporting
- pursuit of a benefit or advantage in violation of the Center's conflict of interest policy
- misappropriation or misuse of Center resources, such as funds, supplies, or other assets
- authorizing or receiving compensation for goods not received or services not performed
- authorizing or receiving compensation for hours not worked

Whistleblower: an employee who informs a supervisor, a director or the Executive Director about an activity which that person believes to be fraudulent or dishonest.

Rights and Responsibilities

Supervisors or Directors

Supervisors or directors are required to report suspected fraudulent or dishonest conduct to the Executive Director. In addition, supervisors or directors are responsible for maintaining a system of management controls, which detect and deter fraudulent or dishonest conduct. Failure by a supervisor or director to establish management controls or report misconduct within the scope of this policy may result in adverse personnel action against the supervisor or director, up to and including dismissal. The Executive Director is available to assist management in establishing management systems and recognizing improper conduct.

Reasonable care should be taken in dealing with suspected misconduct to avoid:

- baseless allegations
- premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- violations of a person's rights under law

Accordingly, a supervisor or director faced with suspected misconduct:

- should not contact the person suspected to further investigate the matter or demand restitution
- should not discuss the case with anyone other than the Executive Director, the Office of General Counsel, or a duly authorized law enforcement officer
- should direct all inquiries from any attorney retained by the suspected individual to the General Counsel
- should direct all inquiries from the media to the Marketing Department, or in the event that Marketing Department cannot be contacted, to the Executive Director.

Whistleblower Protection

The Center will protect whistleblowers as defined below.

- The Center will use its best efforts to protect whistleblowers against retaliation, as described below. It cannot guarantee confidentiality, however, and there is no such thing as an "unofficial" or "off the record" report. The Center will keep the whistleblower's identity confidential, unless (1) the person agrees to be identified; (2) identification is necessary to allow the Center or law enforcement officials to investigate or respond effectively to the report; (3) identification is required by law; or (4) the person accused of Fraud Policy violations is entitled to the information as a matter of legal right in disciplinary proceedings.
- Center employees may not retaliate against a whistleblower with the intent or effect of adversely affecting the terms or conditions of employment (including but not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or wages). Whistleblowers who believe that they have been retaliated against may file a written complaint with the Executive Director. A proven complaint of retaliation shall result in a proper remedy for the person harmed and the initiation of disciplinary action, up to and including dismissal, against the retaliating person. This protection from retaliation is not intended to prohibit supervisors or directors from taking action, including disciplinary action, in the usual scope of their duties and based on valid performance-related factors.

Contacts

Questions related to the interpretation of this policy should be directed to the Executive Director.