

Greater Milwaukee Synod – ELCA Anti-Fraud Policy Relating to Synod Matters

Hebrews 13:18b “We are sure that we have a clear conscience, desiring to act honorably in all things”.

Proverbs 11:3 The integrity of the upright guides them, but the crookedness of the treacherous destroys them.

General Statement

It is the Greater Milwaukee Synod’s policy to prevent all fraud and improper financial activities, to seek to discover any fraud or improper activities, and to deal appropriately when such activities come to light. The Synod is responsible for implementing internal controls and monitoring activities designed to prevent and detect misappropriation of Greater Milwaukee Synod’s assets and intentional material misrepresentation of the Synod’s financial or other actions constituting fraud. It is the Synod’s responsibility to communicate this policy to all synod council members, employees and volunteers and their responsibility to comply with this policy.

Actions Constituting Fraud

Actions of fraud include but are not limited to:

- Theft of cash, securities, merchandise, equipment, supplies or other assets.
- Unauthorized use of Greater Milwaukee Synod employees, property, credit cards, cell phones or other resources.
- Submission of personal or fictitious employee expenses for reimbursement or fictitious or inflated vendor invoices or payroll records for payment.
- Receiving kickbacks or other unauthorized personal benefits from vendors or others.
- Forgery or fraudulent alteration of any check, bank draft, statement, billing, record, form, report, return or other financial document.
- Intentional material misclassification or misrepresentation of revenues, expenses, costs or other data in financial statements, reports, or other communications.
- Intentional failure to disclose material related party transactions, noncompliance with lender requirements or donor/grantor restrictions or other required disclosure matters.
- Intentional improper use or disclosure of confidential donor, client/customer, employee or Greater Milwaukee Synod proprietary information.
- Any other illegal or unethical activity.

The policy applies to fraud or suspected fraud by synod council members, employees, volunteers, and others doing business with the Greater Milwaukee Synod.

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Fraud and Financial Misconduct Prevention

The Greater Milwaukee Synod is committed to follow best practices including a commitment to educating the staff to prevent fraud and financial misconduct and having an outside audit conducted by a CPA firm to aid in the disclosure of such fraud and financial misconduct.

Reporting Responsibilities and Safeguards

It is the responsibility of every Synod Council member, employee or volunteer to report, preferably in writing, discovered or suspected unethical or fraudulent activity immediately to the Bishop and the Vice-President of the Synod Council. If the Bishop is the suspect, this should be reported to the Vice-President and another officer of the Synod Council. If the Vice-President is the suspect, then this should be reported to the Bishop and another officer of the Synod Council. If there is some reason such reporting is inadvisable, then the report should be brought to another synod officer(s).

The officer who receives a report should report back to the person making the report regarding the results/actions taken.

No reporting party who in good faith reports such a matter will suffer harassment, retaliation or other adverse consequences. Any synod council member or employee who harasses or retaliates against the party who reported such a matter in good faith is subject to discipline up to and including termination of employment. Additionally, no synod council member, employee or volunteer will be adversely affected because they refuse to carry out a directive which constitutes fraud or is a violation of state or federal law.

Any allegation that proves to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

Confidentiality

Anonymous allegations will be investigated, but consideration will be given to seriousness of the issue, its credibility and the likelihood of confirming the allegation from other reliable sources.

All reports will be treated with confidentiality. In the case of allegations made on a requested confidential basis by the reporting person, every effort will be made to keep the identity of the reporting party secret, consistent with the need to conduct an adequate and fair investigation.

Allegations will not be discussed with anyone other than those who have a legitimate need to know. It is important to protect the rights of the persons accused, to avoid damaging their reputation should they be found innocent and to protect the Greater Milwaukee Synod from potential liability.

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Investigation Procedures

The Bishop, Vice-President of the Synod Council, or their delegate will investigate all allegations on a timely basis including the involvement of law enforcement when necessary. The investigation may include but is not limited to examining, copying and/or removing all or a portion of the contents of files, desks, cabinets, computer hard drives and other facilities of the organization without prior knowledge or consent of any individual who may use or have custody of such items or facilities when it is within the scope of the investigation.

The reporting party must not attempt to personally conduct investigations, interviews or interrogations related to the alleged fraudulent activity.

Resolution Procedures

Employees who have committed fraud will be subject to disciplinary action up to and including dismissal. There will be consultation with the Synod Council before an action is taken.

Approved May 5, 2012 (Synod Council Action SC 12.05.10.)