

**BOARD OF ESTIMATE & TAXATION  
TOWN OF GREENWICH  
FINANCIAL IRREGULARITIES POLICY**

**NOTIFICATION OF ACTUAL OR SUSPECTED FINANCIAL  
IRREGULARITIES**

**Authority**

The Town Charter empowers the Board of Estimate and Taxation (BET) with the responsibility to properly administer the Town's financial affairs. Responsibility ensures that Town assets shall be accounted for and protected at all times. Such assets include but are not necessarily limited to cash, securities, equipment, supplies, computer systems and documents containing proprietary and confidential information. The accounting procedures, and shipping and receiving procedures shall be sufficiently adequate to ensure that theft, fraud, embezzlement, diversion, unauthorized use, or other loss or irregularity affecting Town assets does not occur, or can be readily detected, and the responsible parties determined in a timely manner.

The Town Charter also states that the Comptroller is responsible for the control of all receipts and expenditures. The Comptroller must receive timely notification of all irregularities, actual or suspected, involving Town employees. The Comptroller along with the Town Attorney, the Chief of Police, and the Director of Human Resources will determine the conduct of all investigations of actual or suspected financial irregularities of Town property.

**Policy**

This applies to all Town of Greenwich departments.

It is the policy of the Town of Greenwich to maintain effective systems of internal accounting and management security in all Town departments to ensure that:

Loss of Town assets due to unlawful, unauthorized or negligent acts by either Town or non-Town personnel is prevented or minimized.

The Town complies with all applicable laws and regulations including State and Federal Single Audit requirements, and makes accurate representations to outside entities including external auditors.

Risk exposures and potential losses and/or liabilities to the Town are identified, evaluated and effectively addressed.

Falsification of financial records, reports and supporting documentation is prevented.

This policy requires that the Comptroller is timely notified of all known suspected losses and/or conditions adversely affecting Town assets. Such notification will ensure that a comprehensive investigation of the situation is conducted to identify

the cause of the loss; the conditions that permitted the loss to occur; the responsible individual(s); and the recourse, if any; the Town has in seeking remuneration.

### **Procedure**

1. Protection of Town assets is a key management responsibility. All Town managers are responsible for monitoring their department activities to ensure that Town assets are protected from theft and other illegal or unauthorized actions and that financial-related records, reports and documentation are accurate.
2. Department employees are required to immediately notify their department heads of actual or suspected cases of embezzlement, larcenies, theft or other actions potentially jeopardizing Town assets. Department employees need to immediately notify their department heads of suspected and/or actual financial irregularities when they first become aware of such occurrences. Department head are directed to immediately relay that information to the Town Attorney. Once the attorney-client privilege has been invoked, the Town Attorney will immediately notify the Comptroller. The Chief of Police and Human Resources Director will also be notified so that an agreement could be reached as to the course of action that should be pursued.
3. Financial irregularities include, but are not limited to, the following:
  - Falsification of financial records, reports, and/or supporting documentation,
  - Bid inclusion,
  - Theft of Town property including equipment, supplies, inventory, tools, etc.,
  - Theft of cash including embezzlement,
  - Paying employees for time not worked, or paying employees for overtime or shift differentials not earned,
  - Falsification of vacation, sick, and compensatory leave, and
  - Paying vendors, consultants and others for services or materials not received.
4. Department heads are urged to periodically inform their managers and supervisors of this policy since non-compliance will be viewed by the BET as a serious transgression and subject employees to appropriate disciplinary actions.