

Policy and Procedure: Corporate Compliance
Topic: Investigation of Compliance Issues

Purpose:

Oswego County Opportunities, Inc. (Sometimes also referred to as “OCO, Inc.”, “Agency” or “the Agency”) has incorporated investigation requirements within policies that cover incidents requiring investigations such as fraud, sexual and non-sexual harassment, client abuse, child abuse and similar situations.

Our policies, procedures and investigation measures promote a culture within the organization that promotes prevention, detection and resolution of misconduct. Employees are encouraged to report issues via the traditional chain of command, Internal Auditor, Director of Finance, Executive Director, Human Resources, or other appropriate management staff.

Policy:

OCO, Inc. will respond to reports or reasonable indications of suspected non-compliance by commencing a prompt and thorough investigation of the allegations to determine whether a violation has occurred.

Procedures:

1. Refer to specific procedures as outlined in applicable policies. Notes of interviews and documents associated with the investigation should be retained as part of the investigation file. If during the initial inquiry, there is sufficient evidence of possible noncompliance of any criminal, civil, or administrative law to warrant further investigation, the issue may be turned over to legal counsel and/or law enforcement.

BOD Approval: 10/02/2007

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Policy Council Approval:

Amended: N/A

Effective: 10/01/2007