

Document No.: PL-01-001.1
Title: Risk Management Policy



Owner: Diane Head, Executive Director

Status: Under Review

Original Issue Date: 11/29/2001

Expiration Date: Until further notice

Last Revision Date: 8/15/2019

To: All CareerSource North Florida Staff

Purpose: This policy establishes the overall goals for providing quality one-stop services and mitigating and minimizing risk, and the actions to be taken for suspected misconduct committed, encountered, or observed by directors, employees, and volunteers.

Reference:

- PC-01-002 Risk Management Procedure

Background

In order to ensure a safe and secure environment within the CareerSource North Florida organization, the North Florida Workforce Development Board has developed this policy to monitor, assess, and mitigate risk across the system and effectively address suspected misconduct.

Content

DEFINITIONS

Misconduct—For purposes of this policy, misconduct includes, but is not limited to:

- Actions that violate CSNF’s Code of Conduct (and any underlying policies) or any of the accounting and financial policies included in this manual.
- Fraud (see below).
- Forgery or alteration of checks, bank drafts, documents, or other records (including electronic records).
- Destruction, alteration, mutilation, or concealment of any document or record with the intent to obstruct or influence an investigation, or potential investigation, carried out by a department or agency of the state or federal government or by CSNF in connection with this policy.
- Disclosure to any external party of proprietary information or confidential personal protected information obtained in connection with employment with or service to CSNF.
- Unauthorized personal or other inappropriate (non-business) use of equipment, assets, services, personnel, or other resources.
- Acts that violate federal, state, or local laws or regulations.
- Harassment.
- Violence.
- Retaliation.
- Accepting or seeking anything of material value from contractors or persons providing goods or services to CareerSource North Florida. Exception: gifts valued at \$50 or less.
- Impropriety of the handling or reporting of money in financial transactions.

- Failure to report known instances of misconduct in accordance with the reporting responsibilities described herein (including tolerance by supervisory employees of misconduct of subordinates).

Fraud—For purposes of this policy, fraud includes, but is not limited to:

- Theft, embezzlement, or other misappropriation of assets (including assets of or intended for CSNF, as well as those of our clients, subcontractors, contractors, suppliers, and others with whom CSNF has a business relationship).
- Intentional misstatements in CSNF's records, including intentional misstatements of accounting records or financial statements and performance data.
- Authorizing or receiving payment for goods not received or services not performed.
- Authorizing or receiving payments for hours not worked.
- Forgery or alteration of documents, including but not limited to checks, timesheets, contracts, purchase orders, receiving reports.

DESCRIPTION

CSNF faces many risks associated with fraud, abuse, and other forms of misconduct. The impact of these acts, collectively referred to as misconduct, may include, but is not limited to:

- Financial losses and liabilities
- Loss of current and future revenue and customers
- Negative publicity and damage to CSNF's good public image
- Loss of employees and difficulty in attracting new personnel
- Deterioration of employee morale
- Harm to relationships with clients, contractors, bankers, and subcontractors
- Litigation and related costs of investigations, etc.
- Personal injury to staff and customers

CSNF is committed to establishing and maintaining a work environment of the highest ethical standards. Achievement of this goal requires the cooperation and assistance of every director, employee, and volunteer at all levels of CSNF.

It is the policy of North Florida Workforce Development Board, Inc. (NFWDB) for all risks of loss to be minimized by effective risk management and loss prevention measures in the CSNF system. This policy endorses the principle that to be effective, risk management and loss prevention is the responsibility of all levels of management, personnel, and partners. The Board encourages the commitment of the CSNF staff and One-Stop Operator to establish and maintain effective day-to-day practices in each service location that promote a safe and secure environment for delivery of quality services in a confidential manner. The focus of these practices is to prevent the effects of misconduct from causing harm to the organization, its staff, and its customers through:

- Education of all levels of staff and partners concerning security and risk threats;
 - Monitoring activities resulting in loss of time, equipment, and resources;
 - Timely and accurate implementation of procedures to maximize security and prevent losses;
- and

- Timely reports to Board staff of security issues, incidents, and adverse occurrences within the organization.

Employees of and under the direction of CSNF are required to immediately report all cases of fraud, misconduct, accidents, and injuries to the Operations Director, or in his or her absence, their designee (or Executive Director in cases involving Management level staff). Within 24 hours of receiving a report of fraud, misconduct, accident, or injury, an investigation must be completed and submitted to the Executive Director in accordance with PC-01-002 Risk Management Procedure.

The Executive Director, and/or a designee (e.g. One-Stop Operator), shall conduct a risk assessment annually to ensure all procedures are being followed and risk is effectively mitigated, contributing to the overall security and risk management within the one-stop system.

Action

For immediate implementation, all CSNF staff and North Florida Workforce Development Board members must adhere to this policy and follow the procedures outlined for implementation, including any future updates.

Timeline

This policy is effective until further notice. It should be reviewed following three years of issuance or a change in referred guidance.

Signature



Mike Williams, WDB Chair

08/15/2019

Date



Diane Head, Executive Director

08/15/2019

Date

CareerSource North Florida is an Equal Opportunity Program. Auxiliary aids and services are available upon request to individuals with disabilities. All voice telephone numbers on this website may be reached by persons using TTY/TDD equipment via the Florida Relay Service at 711.