

Whistleblower Policy

1. Policy Objectives

- a) In furtherance of its corporate purposes, the Emma S. Clark Memorial Library resolves to adhere to all applicable federal and state laws, regulations and the policies it has adopted. To assist the Library in assuring such compliance it is deemed the responsibility of its Trustees, Library Director, Library employees and volunteers to disclose any alleged illegal, fraudulent or unlawful activity or practice engaged in by the Trustees, a Trustee, the Library Director, employees or volunteers to the Library Director or Board President in order to afford the Library a reasonable opportunity to investigate and take corrective action, when warranted.
- b) To encourage and enable the reporting of suspected or actual violations, this policy creates a procedure for authorizing written reports regarding any action taken by or within the Library that is reasonably believed to be illegal, fraudulent or in violation of any adopted law, regulation or Library policy.
- c) To reinforce the Library's commitment to maintaining high ethical standards in the conduct of its business, this policy provides for protections prohibiting retaliation against those who make a written report alleging actual or suspected illegal, fraudulent or unlawful activities or practices engaged in by the Trustees, a Trustee, the Director, an employee or volunteer.

2. Procedure for Reporting

- a) If any Trustee, employee or volunteer of the Library reasonably believes that the Trustees, a Trustee, employee or volunteer have/has engaged in conduct that is illegal, fraudulent or in violation of any adopted policy of the Library or that a policy or practice is in violation of law or regulation, a written report is to be filed with the Library Director. If a person elects not to make a report to the Library Director, a written report may be filed with the President of the Board of Trustees.
- b) If any Trustee, employee or volunteer reasonably believes that the Library Director has engaged in conduct that is illegal, fraudulent or in violation of any adopted policy of the Library or that a policy or practice is in violation of law or regulation, a written report is to be filed with the President of the Board of Trustees.
- c) If the Library Director reasonably believes that the Trustees, a Trustee, employee or volunteer has engaged in conduct that is allegedly illegal, fraudulent or in violation of any adopted policy of the Library or that a policy or practice is in violation of law or regulation, a written report is to be filed with the President of the Board of Trustees.

3. Protection Against Retaliatory Actions

- a) The Library is not to retaliate against a Trustee, Library Director, employee or volunteer who in good faith has made a written report to the Library Director or Board President alleging any action/conduct or suspected action/conduct of the Trustees, a Trustee, the Library Director, employee or volunteer that is allegedly illegal, fraudulent or in violation of any policy adopted by Library.
- b) Anyone who, in the assessment of the Library Director or Board President, willfully files a false report of wrongdoing will be subject to disciplinary action which may include termination from employment or dismissal from the Board.

4. Processing of Reported Violations & Confidentiality

- a) Reports of actual or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. There are certain circumstances in which the Library may be required to disclose the reporting person's identity; for example, to conduct a thorough investigation to comply with the law and/or to provide accused individuals of their entitlement to prepare and present a defense.
- b) The Library Director will acknowledge receipt of a written report setting forth the actual or suspected violation within 20 business days to the person filing the written report. If the report was filed with the Board President, receipt shall be acknowledged in the same manner.
- c) All reports will be promptly investigated and appropriate corrective action (including a follow-up with the person filing the report) will be taken if warranted by the investigation.
- d) It is to be the responsibility of the Library Director to administer this policy and to report to the Board of Trustees any written reports received by the Director and the manner in which they were resolved. It is the responsibility of the Library Director to distribute a copy of this policy to all Trustees, employees and volunteers who provide services to the Library, and provide advice to Library employees and volunteers as needed to inform as to the terms and implementing protocols of this Policy.

My signature below indicates that I have received and read the Whistleblower Policy and make a commitment to adhere to its terms,

Trustee/ Director/Employee/ Volunteer Signature

Date

Adopted December 17, 2014