

19. WHISTLEBLOWER POLICY

Approved: 03/07/2022

1. POLICY

The Stewart B Lang Memorial Library will investigate any reported or suspected fraudulent or dishonest use of the Library's resources, property or information.

2. REPORTING

2.1 Fraudulent or dishonest conduct includes, but is not limited to, the following:

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of files
- Fraudulent financial reporting
- Misappropriation or misuse of resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked
- Theft at the Point of Sale

2.2 A whistleblower is any Stewart B. Lang Memorial Library employee, consultant, volunteer, or Trustee who informs the Library, through the process described herein, of an activity relating to the Library that the person believes to be fraudulent or dishonest.

2.3 Any concern about actual or potential fraudulent or dishonest conduct shall be reported to either the Library Director or a Trustee. A person reporting a concern may request anonymity, but where a concern is reported anonymously it must be reported in writing.

2.4 The Director shall report any actual or potential fraudulent or dishonest conduct to the Board President or to another Trustee.

2.5 Any person reporting, receiving, or knowing of a report shall take reasonable care to avoid:

- Baseless allegations
- Premature notice to persons suspected of misconduct
- Disclosure of suspected misconduct to others not involved in the investigation
- Violations of a person's legal rights

3. INVESTIGATION

3.1 Upon receiving a report of actual or potential fraudulent or dishonest conduct, the Library Board shall review and analyze the report, and shall document the receipt, retention, investigation, and outcome of the report.

3.2 The Board shall take appropriate corrective action, if necessary, and shall communicate its conclusions to the reporting person (if known).

3.3 At its discretion, the Board may rely in whole or in part on investigations by independent persons such as, but not limited to, auditors and/or attorneys.

4. WHISTLEBLOWER PROTECTION

- 4.1 The Library shall use its best efforts to protect Whistleblowers against retaliation.
- 4.2 All reports shall be handled with sensitivity, discretion and confidentiality to the extent allowed by circumstances and the law.
- 4.3 Generally, this means that reports will only be shared with those who have a need to know in order for the Library to conduct an effective investigation and cooperate with law enforcement personnel.
- 4.4 Neither the Library nor any Trustee, employee, consultant, or volunteer may retaliate against a Whistleblower for reporting fraudulent or dishonest conduct.
- 4.5 Prohibited retaliation includes, but is not limited to, threats of physical harm, loss of job or position, punitive work assignments, or impact on compensation or benefits.
- 4.6 Whistleblowers who believe that they have been retaliated against may file a written report with the Board President or another Trustee. The Board shall promptly investigate any report of retaliation, and shall take any appropriate corrective measures.

5. DOCUMENTATION

Records of reports of fraudulent or dishonest conduct, and records of investigations and corrective actions, shall be retained in the Library's files in accordance with the Library's records retention procedure.

Revision Summary:

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