

## **LIBERTY PUBLIC LIBRARY WHISTLEBLOWER POLICY**

The Liberty Public Library ("the Library") Whistleblower Policy establishes procedures for reporting and handling Concerns regarding action or suspected action taken by or within the Library that is or may be illegal, fraudulent or in violation of any Library policy, as well as any other matter that could cause serious damage to the Library's reputation. This policy asserts that all trustees, employees and volunteers who report any Concerns about such actions or suspected actions can do so without the fear of intimidation, harassment, discrimination or retaliation.

1. A trustee, employee or volunteer has an affirmative duty to disclose to and seek guidance from the Library Director if s/he believes any person employed by or working for the Library has engaged, is engaging, or may engage in any illegal or unethical behavior or has violated, or may violate any Library policy. Such reportable activity may include, but not be limited to:
  - a) Financial wrongdoing (including circumvention of internal controls);
  - b) Fraud;
  - c) Harassment;
  - d) Other illegal, unethical, or proscribed conduct.
2. Should the response to any reported Concern to the Library Director be deemed to be inadequate or unsatisfactory, the individual may direct her/his report to the President of the Library's Board of Trustees.
3. Should the Concern relate to the actions or suspected actions of the Library Director, the disclosure should be made to the President of the Library's Board of Trustees.
4. While Concerns may be submitted at any time, the report should be made as soon as reasonably possible after becoming aware of the matter.
5. Concerns may be submitted either orally or in writing. No form is required to submit a Concern; the individual is encouraged to provide as much information and detail as possible so that the Concern can be properly investigated. A Concern may be submitted:
  - a) By discussing it with the Library Director, who will prepare a written record as outlined in item 13 below and in turn forward the Concern to the Board of Trustees for review where appropriate; or
  - b) In writing to the Library Director who will in turn forward the Concern to the Board of Trustees for review where appropriate.
  - c) Concerns may be raised anonymously; provided, however, that any individual reporting her/his own violation shall not satisfy her/his obligation hereunder with a Concern raised anonymously.
6. Any trustee, employee or volunteer receiving a Concern should contact the Library Director, who will coordinate further action, unless the Concern involves the Library Director then the Board President should be contacted.
7. The Library Director or Board President will assess each Concern on a preliminary basis to determine to what extent an investigation into the Concern is required, and will direct all aspects of the investigation of any Concern.

8. All Concerns received and subsequent investigations will be treated confidentially or anonymously, as applicable, to the extent reasonable and practicable under the circumstances.
9. Information related to any investigation will be disclosed only as needed to facilitate review of the investigation materials or otherwise as required by law.
10. Trustees, employees or volunteers must cooperate as necessary in connection with any such investigation.
11. In the event a Concern involves or implicates any Board member, the trustee will promptly recuse them-self from the investigation.
12. The Board of Trustees will investigate any Concern which the Library Director is not able to resolve or is the target of such Concern.
13. The Library Director (or other person designated by the Board) will maintain a written record of all Concerns summarizing in reasonable detail for each Concern:
  - a) The nature of the Concern (including any specific allegations made and persons involved);
  - b) The date of receipt of the Concern;
  - c) The current status of any investigation into the Concern and information about such investigation (including the steps taken in the investigation, any factual findings, and the recommendations for corrective action);
  - d) Any final resolution of the Concern;
  - e) The Library Director (or other person designated by the Board) will distribute an update of this record to the Board in advance of each regularly scheduled meeting.
14. No adverse employment action may be taken and retaliation is strictly prohibited, including, without limitation, intimidation, harassment, discrimination, coercion, or otherwise, whether express or implied, against any trustee, director, employee or volunteer of the Library who in good faith reports any Concern or assists in an investigation of, or the fashioning or implementation of any corrective action or response made in connection with, any Concern.
15. Any person who violates this prohibition against retaliation will be subject to appropriate disciplinary action, which may include disciplinary action up to and including termination of employment or other relationship with the Library.
16. A copy of this Policy will be distributed to each trustee, employee and volunteer promptly following the adoption of or amendments to this Policy, and at such time as a person joins the Library as a trustee, employee or volunteer.
17. The Board is responsible for providing oversight of the adoption and implementation of, and compliance with this Policy.

Adopted 2/24/2015