

Whistle Blower Policy

(Adopted 11/25/2014, Revised 3/24/22)

Harborfields Public Library is committed to operating in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations included, but not limited to, those concerning accounting and auditing, and prohibits fraudulent or unlawful practices by any of its board members, Library administrators, employees, and volunteers (“covered individuals”). This policy applies to any matter that is related to the Library’s business that is not the private acts of an individual not connected to the Library.

If a board member, Library administrator, employee or volunteer has a reasonable belief that another covered individual has engaged in any action that violates any applicable law, rule or regulation, which presents a substantial and specific danger to public health or safety or that constitutes fraud or improper governmental action, the employee is required to immediately report such information to the Library Director. If the employee does not feel comfortable reporting the information to the Library Director, or if the information concerns the actions of the Library Director, the employee is required to report the information to a member of the Library Board of Trustees.

All reports will be followed up promptly, and an investigation conducted. All covered individuals may be required to cooperate as needed in an investigation to the extent permitted by law. While the process may vary from case to case, the following investigation procedure must be followed when the Library receives a report of an alleged violation of the conduct prohibited by this Policy:

- The Library Director, or designee, will conduct the investigation. Third parties may be designated to investigate a complaint or assist with any investigation.
- Upon receipt of a report of an alleged violation, the Library Director, or designee, will conduct a prompt review of the allegations. If the report is oral, the Library Director, or designee, will encourage the reporting individual to provide the report in writing. If the employee refuses, the Library Director, or designee, will prepare a written version of the report based on the oral reporting.
- If documents, emails, phone records or other paper or electronic records are relevant to the allegations, the Library will take steps to obtain and preserve them.
- The Library Director, or designee, will request and review all relevant documents, including all electronic communications.
- The Library Director, or designee, will interview all parties involved, including any relevant witnesses.
- All records of the investigation will be maintained in a secure and confidential location.
- The Library Director, or designee, will notify the individual who made the report of the outcome of the investigation.
- At the conclusion of the investigation, the Library Director, or designee, will report the findings to the Board of Trustees. If it is found that prohibited conduct has, in fact, occurred, the Library Director, or designee, will make a recommendation to the Board of Trustees and appropriate corrective action will be taken.

When conducting an investigation pursuant to this Policy, the Library will strive to keep the identity of the reporting individual confidential to the extent possible, as long as doing so does not interfere with conducting a complete and thorough investigation and taking any necessary corrective action, and except as otherwise required by law/a law enforcement agency.

The Library prohibits retaliation against any employee who, in good faith, reports a violation of any applicable law, rule or regulation, which presents a substantial and specific danger to public health or safety or that constitutes fraud or improper governmental action; participates in an investigation conducted pursuant to this Policy; or provides truthful information concerning an alleged violation to a law enforcement agency. Any employee who believes that they have been retaliated against in violation of this Policy should report it using the above reporting procedure.

Employees who engage in prohibited retaliation; make a knowingly false report of a violation pursuant to this Policy; or who provide knowingly false information during an investigation pursuant to this Policy or to a law enforcement agency; may be subject to disciplinary action, up to and including termination of employment.

Board members, Library Administration, staff and volunteers will be trained on, and receive a copy of this Policy upon hire/onboarding as a new volunteer or trustee and on an annual basis thereafter. Anyone with questions regarding this Policy should contact the Library Director.