

Sewickley Public Library
Whistleblower Policy

Sewickley Public Library
Policy No.: 106
Title: Whistleblower Policy
Section: 100 General Administration

Date Adopted: April 13, 2009
Date Revised: October 10, 2016

Purpose: The purpose of the Whistleblower Policy is to encourage employees to disclose any malpractice or misconduct of which they become aware and importantly to provide protection for employees who report allegations of such malpractice or misconduct. The policy applies to all employees, suppliers, agents, contractors and customers of the Sewickley Public Library.

References: Fraud Policy; Code of Ethics and Conduct; Conflict of Interest Policy

1. Statement of Policy

The Sewickley Public Library requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Sewickley Public Library, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

2. Reporting Responsibility

It is the responsibility of all directors, officers, employees, and volunteers to comply with all applicable policies and laws, and to report violations or suspected violations in accordance with the Whistleblower Policy.

3. No Retaliation

No director, officer, employee, or volunteer who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Sewickley Public Library prior to seeking resolution outside the Sewickley Public Library.

4. Reporting Violations

The Library's "open door policy" establishes a mechanism that employees shall use to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with anyone in management whom you are comfortable approaching. Supervisors and managers are required

to report suspected violations to the Sewickley Public Library's Board President, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the Sewickley Public Library's open door policy, individuals should contact the Sewickley Public Library's Board President directly.

5. Compliance Officer

The Sewickley Public Library's Board President is responsible for investigating all reported complaints and allegations concerning violations of library policies and shall advise the Library Director, the audit committee, and the Board of Directors. The Board President has direct access to the audit committee of the Board of Directors and the full Board of Directors and is required to report to the audit committee at least annually on compliance activity.

6. Accounting and Auditing Matters

The audit committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Board President shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

7. Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of library policies must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.

8. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

9. Handling of Reported Violations

The Board President will notify the sender and acknowledge receipt of the reported violation or suspected violation in a timely manner. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Adapted from the National Council of Nonprofit Associations