

**Subject: Whistle-Blower Protection**

**Application: Library System Trustees and Employees**

***Introduction***

Westchester Library System requires its trustees, officers and employees to observe high standards of business and personnel ethics in the conduct of their duties and responsibilities. As employees and representatives of WLS, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Each member of the WLS community has the responsibility to report actions that violate laws, regulations, and/or Code of Ethics. In keeping with WLS' commitment to fostering a community of integrity and staff support, WLS has created a means whereby staff members are to report any concerns they may have relating to such violations.

The matters which should be reported under this policy include suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misuse of WLS' assets or suspected regulatory compliance violations.

***Statement of Policy***

An employee who makes a report is protected from any harassment, victimization, and change in employment, up to and including dismissal that results from making the report. Managers must ensure that the procedures are available and known to all employees and that all employees have easy access to the mechanism for making a report.

An employee who suspects wrongdoing by a colleague should first reach out to their supervisor to address the matter directly. If the matter cannot be resolved at this level, or if for some reason the employee is uncomfortable with bring the matter to their supervisor's attention, the employee should contact the Controller. Trustees may also contact the Controller or the Chairman of the Audit Committee of WLS Board of Trustees. Should the Controller be suspected of wrongdoing, then the matter should be reported to the Executive Director.

Alternatively, any employee and/or trustee may make an anonymous and confidential complaint about an alleged violation to the Controller or the Executive Director.

***Investigation***

Ordinarily, the Controller will conduct a preliminary investigation. During the preliminary investigation, the Controller will discuss the complaint with the manager responsible for the department named in the complaint. If the preliminary investigation

shows no justification for a complaint, the complaint will be closed and the complainant will be notified of this decision.

If the preliminary investigation reveals potential wrongdoing, the Controller will pass on the complaint to the Executive Director who will report to the Audit Committee of the Board of Trustees if the situation warrants. They, in turn, will decide how the investigation is to be carried out, in consultation with the Executive Director. The staff person making the complaint will receive general information on the progress of the investigation and its outcome unless doing so would jeopardize the investigation.

The Controller will present the results of all investigations and settlement of all complaints to the Board of Trustees in a timely fashion.

*This policy was approved by the WLS Board of Trustees at their 8/21/2007 Meeting and is to be reviewed annually.*