

Subject: Whistle-Blower Protection

Application: Trustees, employees and volunteers

Introduction

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

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's commitment to fostering a community of integrity and staff support, employees are expected to report concerns they may have relating to such violations.

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

The WLS Executive Director shall be responsible for the administration of this policy and shall provide a copy of this policy to all trustees, officers and employees, and to all volunteers who provide substantial services to WLS.

Reporting Infractions

A trustee, officer, employee, volunteer or representative who makes a report is protected from any intimidation, discrimination, harassment, victimization or other retaliation, and, in the case of employees, adverse employment consequence 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.

All reports made under this policy, and investigations relating thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. Disclosure of such reports to individuals not involved in the investigation will be viewed as a serious disciplinary offense.

An employee who suspects wrongdoing by a colleague should first reach out to his/her 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 bringing the matter to his/her supervisor's attention, the employee should contact the WLS Executive Director or, if necessary, the Chairperson of the WLS Board of Trustees' Audit Committee. Trustees or

other volunteers may report suspected wrongdoing directly to the Chairperson of the WLS Board of Trustees' Audit Committee.

Investigation

Ordinarily, the Executive Director or the Chair of the Audit Committee will direct the Controller to 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 Executive Director will pass on the complaint 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 Executive Director and/or Chairperson of the WLS Board Audit Committee will present the results of all investigations and settlement of all complaints to the Board of Trustees in a timely fashion.

Last approved: May 26, 2015