



Clinton-Essex-Franklin Library System *Whistleblower Protection Policy*

*Adopted by the Board of Trustees
July 27, 2009*

Purpose

The Clinton-Essex-Franklin Library System (hereinafter, “CEFLS”) encourages all staff, board members and volunteers, acting in good faith to report suspected or actual wrongful conduct. Any CEFLS staff member, board member or volunteer who reports a suspected or actual wrongful conduct, in good faith, will not be fired or otherwise retaliated against for making the report.

This whistleblowing policy is intended to protect the reporter when concerns are raised regarding CEFLS, such as the following:

- Incorrect financial reporting;
- Unlawful activity;
- Activities that are not in line with CEFLS policies; or
- Activities which otherwise amount to serious improper conducts.

CEFLS is committed to upholding the highest of standards of ethical, moral, and legal business conduct, and the commitment to open communication. All staff members, trustees, and volunteers are required to uphold high standards of business and personal ethics in the conduct of their duties and responsibilities. This policy provides an avenue for all employees and board members to raise any concerns without the fear of retaliation.

Regulations

Any employee, trustee or volunteer who files a report concerning a violation or suspected violation of this policy must be doing so in good faith and have reasonable grounds for believing the information in the report indicates a violation of this policy.

Any employee, trustee or volunteer who knowingly makes a report/complaint in bad faith (gives false information or makes a report in retaliation) will be subject to disciplinary action and/or personnel action up to and including termination, consistent with CEFLS policies, rules and collective bargaining agreements

Any employee or trustee who reports in good faith a possible violation of this policy will not suffer any harassment, retaliation, or adverse employment consequence. Any employee who retaliates against someone who has filed a complaint in good faith is subject to disciplinary action and/or personnel action up to and including termination, consistent with CEFLS policies, rules and collective bargaining agreements.

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

The Whistleblower policy is intended to encourage and promote employees and others to raise any serious concerns within CEFLS prior to seeking resolution outside CEFLS.

Reporting Violations

Individuals should share their questions, concerns, suggestions, or complaints with the Library Director, who will address the concern promptly. If it is inappropriate to make the report with the Library Director, individuals can take their concerns to any Executive Board Member. An alternative method to report any concern is to place an anonymous *Whistleblower Reporting Form* in the Administrative Assistants mail box (in a sealed envelope), who will then direct the report to the appropriate individual. All reports should be made using the *Whistleblower Reporting Form*.

Handling Reports

An appropriate investigation will be undertaken and a report summarizing the findings will be given to the individual who filed the complaint (if a name is given) within 5 business days. If more than 5 business days are needed, the individual who filed the complaint will be notified in writing, of an estimated date the investigation will be completed (to be done no later than 30 days after the first report is made). Steps will be taken to deal with the issue consistent with CEFLS policies, rules and collective bargaining agreements.

Responsibilities

All staff member, board members and volunteers must be knowledgeable about this policy. All reports/complaints made must go through the appropriate channels noted above.

Management must make sure that all employees, trustees and volunteers are aware of this policy and understand the channels of reporting. Any findings of wrongful conduct or false allegations must be kept in the individual's personnel file.

The individual(s) who undertake the investigation must uphold confidentiality to the fullest extent possible, and must investigate the claim in a clear state of mind.



Clinton-Essex-Franklin Library System *Whistleblower Report Form*

*Adopted by the Board of Trustees
(date)*

Applies to: Union Employees, Management Confidential Employees, Board of Trustees and Volunteers

Instructions:

Submit this form using the appropriate channel, as noted in the Whistleblower Policy:

“Reporting Violations

Individuals should share their questions, concerns, suggestions, or complaints with the Library Director, who will address the concern promptly. If it is inappropriate to make the report with the Library Director, individuals can take their concerns to any Executive Board Member. An alternative method to report any concern is to place an anonymous *Whistleblower Reporting Form* in the Administrative Assistants mail box (in a sealed envelope), who will then direct the report to the appropriate individual. All reports should be made using the *Whistleblower Reporting Form.*”

Date Report Made/Filed: _____

Person reporting the actual or suspected wrongful conduct:

(Do not complete this section if you wish this to be an anonymous report)

Name: _____ Title: _____

Department: _____

E-mail Address: _____

Person against whom the report of actual or suspected wrongful conduct is being made:

Name: _____ Title: _____

Department: _____

E-mail Address: _____

**Use the back of this form or additional sheets to describe the alleged wrongful conduct. Include specific facts and any documentation you have, as well as the names of any individual at CEFLS (or member libraries of CEFLS) with whom you have discussed your concerns.*