# Suffern Free Library - Whistleblower

# Approved by Suffern Free Library Board of Trustees on 06/28/2022

This policy supersedes all prior policies and practices relative to this subject

The Suffern Free Library, ("Library") requires trustees, the director 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 Library they must conduct themselves with honesty and integrity in fulfilling their responsibilities and complying with all applicable laws and regulations.

It is the responsibility of all trustees, the director and employees to report any actual or suspected violations of policy, procedure, or ethics; illegal activity; or other misconduct by employees, volunteers or others related to the organization in accordance with this Policy. The Library encourages employees, volunteers and others connected to the Library to report such violations or misconduct.

No trustee, director, employee or volunteer who in good faith reports a violation or misconduct shall suffer harassment, retaliation or adverse employment or personal or professional 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 Policy is intended to encourage and enable employees and others to raise serious concerns within the Library prior to seeking resolution outside the Library.

## **Reporting Violations**

The Library has an open door policy and urges that employees share their questions, concerns, suggestions or complaints with someone in the chain of command 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 the employee is not comfortable speaking with his/her supervisor or is dissatisfied with the supervisor's response, he/she is encouraged to speak to the Library Director or his/her designee, Board Officer or Trustee, Compliance Officer or anyone in management with whom he/she is comfortable approaching. The recipient of such a complaint is required to report suspected violations and misconduct of a serious nature to the Library's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. To the extent that the alleged activity or misconduct involves the Compliance Officer, or anyone in the chain of command, the complainant may make the complaint, instead, to the Board Officers, Trustees, or anyone who serves's the Library in a supervisory capacity.

## **Compliance Officer**

The Library's Compliance Officer, or person acting in lieu thereof, is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Director and/or the Board of Trustees.

## **Accounting and Auditing Matters**

The finance committee of the board of trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the finance committee of any such complaint and work with the committee until the matter is resolved. In addition, the Compliance Officer is required to report to the Finance Committee at least annually on compliance activity.

#### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation 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.

## 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.

## Handling of Reported Violations

The recipient of a complaint or the Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

#### **Compliance Officer / Board Treasurer**

Mario Pensa Suffern Free Library, Treasurer (845) 721-4592 cell Mpensa.trustee.suf@rcls.org

#### Library Director Darlene Alessi (845) 357-1237 (library) dalessi@rcls.org