

# **HENDRICK HUDSON FREE LIBRARY WHISTLE-BLOWER PROTECTION POLICY**

## **Introduction**

The Hendrick Hudson Free Library (the “Corporation”) requires its Trustees, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the Corporation we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Each member of the Hendrick Hudson Free Library community has the responsibility to report actions that do, or appear to, violate laws, regulations, and/or the Code of Ethics and Conflict of Interest Policy. In keeping with the Corporation’s commitment to fostering a community of integrity and employee support, the Corporation has created a process whereby employees are to report any concerns they may have relating to such violations.

The matters which should be reported under this policy include, but are not limited to, suspected fraud, theft, embezzlement, accounting or auditing irregularities, bribery, kickbacks, misuse of the Corporation’s assets or suspected regulatory compliance violations.

## **Statement of Policy**

A Trustee, officer, employee or volunteer of the Corporation who makes a report in good faith or who cooperates with an investigation of such a report, is protected from any intimidation, harassment, victimization, discrimination, adverse employment consequence or other retaliation because of making the report or cooperating with an investigation.

The Director is the administrator of this whistle-blower policy and shall report to the Board of Trustees with respect to it. The Board of Trustees (the “Board”) shall oversee the implementation of and compliance with this Policy. The Director shall ensure that these procedures are available and known to all Trustees, employees, officers and volunteers and that all such persons shall have easy access to the mechanism for making a report.

## **Reporting Procedure**

Any person may report a suspected violation of this Policy (a “Suspected Violation”), either in writing or verbally. The report should include any available documentation to support a reasonable basis for the allegation(s) and to assist in investigating the complaint.

Reports of Suspected Violations may be made anonymously. Anonymous reports should be detailed to the greatest extent possible, as follow up questions will not be possible.

All reports of Suspected Violations should be directed to the Director. If the Director is the subject of the Suspected Violation, or if a person is not comfortable reporting a Suspected Violation to the Director or is unsatisfied with the response of the Director, the person is encouraged to instead communicate with the President or with another member of the Board of Trustees.

Persons who report Suspected Violations are not responsible for investigating the activity reported or for determining fault or corrective measures.

Although a person is not expected to prove the truth of the allegation(s) asserted in his or her report, she or he must demonstrate reasonable grounds for concern and act in good faith. No investigation will be made of unspecified wrongdoing or broad allegations. A report that proves to be unsubstantiated and to have been made maliciously or with the knowledge that such allegations were false will be viewed as a serious offense.

### **Handling Reports of Suspected Violations**

Unless the report is submitted anonymously or there are overriding legal or public interest concerns, the Director will provide the person who made the report with an acknowledgment of receipt of his or her report within ten business days of receiving the report.

All reports will be promptly investigated and resolved by or under the direction of the Director. Depending on the Director's determination of the seriousness or severity of the report, the Director may resolve a report without consulting others; discuss such report with the Board or an authorized committee thereof before taking action; or refer the matter to the Board or an authorized committee thereof for action. The Director may delegate the responsibility to investigate a report to one or more employees of the Corporation or to any other individual, including persons not employed by the Corporation; provided that the Director may not delegate such responsibility to an individual who is the subject of such report, or in a manner that would compromise the identity of a person who made a report anonymously, the confidentiality of the report or the confidentiality of the investigation.

Any person who is the subject of a Suspected Violation may not be present at or participate in Board or committee deliberations or vote on the matter relating to such Suspected Violation. However, the Board, or an authorized committee thereof, may request that the person who is subject to the Suspected Violation present information as background or answer questions at a Board or committee meeting prior to the commencement of deliberations or voting relating to the Suspected Violation.

Appropriate corrective action will be taken if warranted by the investigation.

On at least a quarterly basis, the Director shall provide the Board or an authorized committee thereof a report identifying all reports of Suspected Violations, if any under this Policy during the preceding quarter or indicating that no such reports were made. Records of all reports and investigations shall be maintained in the Corporation's records in a manner which will protect their confidentiality.

## **Questions and Distribution**

Any questions, concerns, or suggestions regarding this Policy should be addressed to the Director.

Copies of this Policy shall be distributed to all Trustees, officers, employees and volunteers providing substantial services to the Corporation. The Corporation may choose to satisfy this distribution requirement by posting this Policy on its website or at its offices in a conspicuous location accessible to Trustees, officers, employees and volunteers.