

## **Coburn Free Library Whistleblower Policy**

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The library is committed to operating in an environment of honesty and integrity and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing. The Coburn Free Library prohibits fraudulent practices by any of its trustees, officers, employees, or volunteers and expects its trustees, officers, employees, and volunteers to conduct themselves in accordance with the law, regulation, Coburn Free Library policies, and procedures. The Coburn Free Library hereby establishes a policy against unlawful or fraudulent conduct and outlines a procedure for employees to report actions that a trustee or employee reasonably believes violates a law or regulation, or that constitute fraudulent accounting or other practices. This policy applies to any matter which is related to the Coburn Free Library's business and does not relate to private acts of an individual not connected to the business of the library.

### **Definitions**

#### **Fraudulent or Dishonest Conduct:**

Action or failure to act with the intention of obtaining an unauthorized benefit, including, but not limited to:

- Forgery or alteration of documents
- Unauthorized alteration or manipulation of files
- Fraudulent financial reporting
- Misappropriation or misuse of resources, such as funds, supplies, or other assets
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked
- Theft

#### **Whistleblower:**

A Coburn Free Library employee, consultant, volunteer, or member of the Board of Trustees, or an employee, consultant, or volunteer who informs the library through the process described below, of an activity relating to the Coburn Free Library, that the person believes to be fraudulent or dishonest.

### **Reporting**

Any concern about actual or potential fraudulent or dishonest conduct shall be reported either to the Coburn Free Library Executive Director or to a Trustee. A person reporting a concern may request anonymity, but where a concern is reported anonymously, it must be reported in writing and sent to the Executive Director or Board of Trustees.

The Executive Director shall report any actual or potential fraudulent or dishonest conduct to the President of the Coburn Free Library Board of Trustees, or to another Board Member. Any person reporting, receiving or knowing of a report shall take reasonable care to avoid:

- Baseless allegations
- Premature notice to persons suspected of misconduct and/or disclosure of suspected misconduct to others not involved with the investigation
- Violations of a person's legal rights

### **Investigation**

Upon receiving a report of actual or potential fraudulent or dishonest conduct, the Coburn Free Library Board of Trustees shall review and analyze the report, and shall document the receipt, retention, investigation, and outcome of the report. The Board of Trustees shall take appropriate corrective action, if necessary, and shall communicate its conclusion to the reporting person. At its discretion, the Board of Trustees may include investigation by independent persons such as, but not limited to, auditors and/or attorneys.

### **Whistleblower Protection**

The Coburn Free Library will not retaliate against an employee in the terms and conditions of employment because that employee:

- (a) reports, in good faith, to a supervisor, the executive director, the Board of Trustees, or to a federal, state or local agency what the employee believes, in good faith, to be a violation of the law; or
- (b) participates, in good faith, in any resulting investigation or proceeding, or
- (c) exercises his or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee's rights.

Neither Coburn Free Library nor any Board Member nor any employee, consultant or volunteer, may retaliate against a Whistleblower for a report of fraudulent or dishonest conduct. However, any allegations that prove to be unfounded and were made maliciously or with prior knowledge that such allegations were false will be subject to serious disciplinary action.

Whistleblowers who believe that they have been retaliated against may file a written report with the President of the Board. The Coburn Free Library Board of Trustees shall promptly investigate any report of retaliation, and take any appropriate corrective measures.

The Coburn Free Library may take disciplinary action (up to and including termination) against an employee, officer, trustee, or volunteer who, in the Board of Trustee's assessment, has engaged in retaliatory conduct in violation of this policy or has violated the provisions of this policy.

### **Record keeping:**

**Board Secretary:** It is the responsibility of the Board Secretary to ensure this form is reviewed and signed annually by all Trustees and Officers. Trustee and Officer signature forms will be kept on file by the Secretary of the Board.

**Executive Director:** It is director's responsibility to ensure this form is reviewed and signed annually by all employees. Staff signature forms will be kept on file by the director.

**APPENDIX A  
COBURN FREE LIBRARY  
WHISTLEBLOWER POLICY**

**ACKNOWLEDGEMENT/CERTIFICATION**

(To be completed by Trustees, Officers, and Employees)

I, \_\_\_\_\_, hereby certify that:

1. I have received a copy of the Coburn Free Library's Whistleblower Policy (the "Policy");
2. I have read and understand the Policy; and
3. I agree to comply with the Policy.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Updated by the Coburn Free Library Board of Trustees **03/17/22**

The Coburn Free Library Board of Trustees reserves the right to amend this policy with no prior notice.