

## **Whistleblower Policy**

The Palisades 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.

### **Reporting Responsibility**

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

### **No Retaliation**

No trustee, director, employee or volunteer who in good faith reports a violation or misconduct will 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 the employee’s supervisor. If the employee is uncomfortable speaking with the employee’s supervisor, or is dissatisfied with the supervisor’s response, the employee is encouraged to speak with the Library Director or his/her designee. In most cases, the Director is in the best position to address an area of concern. If the employee is dissatisfied with the Director’s response, he/she may speak to the designee of the Library Director, a Board Trustee, or the Compliance Officer.

The recipient of such a “whistle blowers” 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 ‘whistle blower’ 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 any Board Trustee.

### **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 shall advise the Director and the President/Executive Committee of the results of any serious

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complaints or allegations. The Compliance Officer has direct access to the President/Executive Committee of the board of trustees and is required to report to the committee at least annually on compliance activity. Allegations involving corporate accounting, internal controls or auditing will be referred by the Compliance Officer to the Finance Committee. The Board Treasurer shall be the Library's Compliance Officer and the chair of the finance committee.

### **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.

### **Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of Library rules/regulations/policies must be acting in good faith and have reasonable grounds for believing the information disclosed to be credible and to constitute a violation. Any allegations that are not substantiated and which prove to have been made in bad faith or with willful disregard for the truth will be viewed as a serious disciplinary offense if made by an employee or Board Member.

### **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 submitted on a confidential basis will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Violations**

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

### **Library Director:**

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Approved by the Board of Trustees on February 12, 2014  
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