

# Tompkins County Public Library

## Whistleblower Policy

The Tompkins County Public Library ("TCPL") shall investigate any suspected fraudulent or dishonest use or misuse of TCPL's resources or property.

### 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 at the Point of Sale

***Whistleblower:*** A TCPL employee, consultant, volunteer, or member of the TCPL Board of Trustees, or an employee, consultant, volunteer, or member of the TCPL Foundation Board of Directors, who informs TCPL through the process described below, of an activity relating to TCPL 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 TCPL Library 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.

The Library Director shall report any actual or potential fraudulent or dishonest conduct to the President of the Tompkins County Public 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 TCPL Board of Trustees shall review and analyze the report, and shall document the receipt, retention, investigation, and outcome of the report. The TCPL Board of Trustees shall take appropriate corrective action, if necessary, and shall communicate its conclusion to the reporting person.

At its discretion, the TCPL Board of Trustees may include investigation by independent persons such as, but not limited to, auditors and/or attorneys.

## **Whistleblower Protection**

Tompkins County Public Library shall use its best efforts to protect Whistleblowers against retaliation. Whistleblowing reports shall be handled with sensitivity, discretion, and confidentiality to the extent allowed by the circumstances and the law. Generally, this means that Whistleblower reports will be shared only with those who have a need to know in order for TCPL to conduct an effective investigation and determine what action to take, and in appropriate cases, to cooperate with law enforcement personnel.

Neither TCPL nor any Board Member nor any employee, consultant or volunteer, may retaliate against a Whistleblower for a report of fraudulent or dishonest conduct. Prohibited retaliation includes, but is not limited to, threats of physical harm, loss of job, punitive work assignments, or impact on salary or fees. Whistleblowers who believe that they have been retaliated against may file a written report with the President of the Board. The TCPL Board of Trustees shall promptly investigate any report of retaliation, and take any appropriate corrective measures.

Draft policy February 15, 2015