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## **POLICY**

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### **WHISTLEBLOWER POLICY**

**Effective October 29, 2009**

#### **General**

Mifflin Community Library (MCL) requires board members, other volunteers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Representatives of MCL must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

This whistleblower policy requires reporting of unlawful or improper workplace behavior including, but not limited to, any of the following conduct: theft; fraudulent, misleading, or negligent financial reporting; improper or undocumented financial transactions; forgery or alteration of documents; unauthorized alteration or manipulation of computer files; improper destruction of records; improper use of MCL assets; improper access to or use of confidential donor information; violations of MCL's conflict-of-interest policy; any other improper occurrence regarding cash, financial procedures, or reporting; and abuse of or discrimination against an MCL employee, volunteer, patron, or other person connected to the library.

#### **Reporting Responsibility**

In accordance with this policy, each board member, other volunteer, and employee of MCL has an obligation to report (a) questionable or improper accounting, financial, or auditing matters and (b) violations and suspected violations of MCL's policies or any unlawful or improper workplace conduct (collectively referred to as "concerns.")

#### **No Retaliation**

This whistleblower policy is intended to encourage and enable board members, volunteers, and employees to raise concerns for investigation and appropriate action. With this goal in mind, no board member, volunteer, or employee who, in good faith, reports a concern shall be subject to harassment, retaliation or, in the case of an employee, adverse employment consequences. Moreover, a volunteer or employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment.

#### **Reporting Concerns**

Employees should first discuss their concern with the Library Director, or, if the Director is the subject of the concern, with the Chair of the Board's Personnel Committee. With assistance from the person to whom the concern is reported, the employee should put the concern in writing. The written concern should then be forwarded to the Chair of the Board's Financial Committee. Written concerns may also be submitted anonymously directly to the Chair of the

Financial Committee.

Board members and volunteers should submit concerns in writing directly to the Chair of the Financial Committee.

### **Handling of Reported Violations**

The Chair of the Financial Committee shall immediately notify the other committee members, the Board President, and the Library Director of any such report. The Chair will also acknowledge receipt of the concern to the sender within five business days, if the sender is not anonymous.

All reports will be promptly investigated by the committee, and appropriate corrective action will be recommended to the Board of Trustees, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the complainant for complete closure of the concern.

The Financial Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

### **Acting in Good Faith**

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice or a violation of MCL's policies. The act of making allegations that prove to be unsubstantiated and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false will be viewed as a serious disciplinary offense and may result in discipline, up to and including dismissal from the volunteer position or termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.

### **Confidentiality**

Reports of concerns and investigations of them shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosing reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.