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THE GREENWICH LIBRARY

WHISTLEBLOWER POLICY STATEMENT

Approved February 10, 2015

Introduction, Applicability and Defined Terms

This Whistleblower Policy Statement (the “Policy Statement”) sets forth the Library’s policy relating to protecting employees to whom this Policy Statement applies from harassment, discrimination, retaliation or other adverse employment consequence in the event such an employee reports “alleged corrupt activity.”

The employees to whom this Policy Statement applies are only those employees of the Library who are not also employees of the Town of Greenwich. Employees of the Town of Greenwich are governed by the Town’s separate whistleblower policy.

Alleged corrupt activity means any action or suspected action taken by the Library, its employees, its trustees, officers or volunteers, and any action taken or suspected to have been taken by any employee of the Town of Greenwich classified on Town records as a Library employee or by any employee of the Library who is not also an employee of the Town of Greenwich, that involves actual or suspected mismanagement, dishonesty, fraud, neglect, falsification of records, unauthorized use or other forms of misconduct and/or violation of laws or Library policies.

An employee who reports alleged corrupt activity pursuant to this Policy Statement is sometimes referred to as a “Reporter.”

1. Reporting Process; Appointment of Compliance Officer

- (a) The Library Board of Trustees (the “Board”) shall appoint one or more persons to serve as the Compliance Officer for purposes of receiving reports of suspected alleged corrupt activity. In the absence of contrary action by the Board after adoption of this Policy Statement, the Library Director shall serve as the Compliance Officer.
- (b) An employee who has knowledge of alleged corrupt activity may report such Activity to the Compliance Officer. If the alleged corrupt activity involves the Compliance Officer, the employee may instead report such Activity to the President of the Board

or any member of the Board's Executive Committee, who shall be deemed the Compliance Officer for purposes of the alleged incident of alleged corrupt activity.

- (c) Nothing in this Policy Statement shall preclude the employee from reporting alleged corrupt activity to an appropriate government agency such as, for example, the Town Attorney for the Town of Greenwich or the Connecticut Attorney General's office, either in addition to, or instead of, reporting the Activity to the Compliance Officer.

2. Investigation of alleged corrupt activity

The Compliance Officer will notify the Reporter that his or her report has been received. All reports will be promptly considered for investigation and, if appropriate, will be investigated. Appropriate corrective action will be taken if warranted by the investigation.

3. Confidentiality

A Reporter may submit a report of suspected alleged corrupt activity on an anonymous basis. The Compliance Officer will take reasonable steps to ensure that all reports of suspected alleged corrupt activity, whether anonymous or otherwise, are kept confidential to the extent practicable, consistent with the need to conduct an adequate investigation.

A Reporter who makes an anonymous report must provide sufficient corroborating evidence to justify the commencement of an investigation. An investigation of unspecified wrongdoing or broad allegations will not be undertaken without verifiable evidentiary support. Because investigators are unable to interview anonymous Reporters, it may be more difficult to evaluate the credibility of their allegations and, therefore, less likely to cause an investigation to be initiated.

4. Protection of Reporter

The Library will not retaliate, or support retaliation, against a Reporter and will take reasonable steps to protect him or her from harassment, discrimination, retaliation or other adverse employment consequences. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, poor work assignments or threats of physical harm.

The right of a Reporter for protection against retaliation does not include immunity for any complicity in the alleged corrupt activity nor shall it excuse the Reporter from cooperating with any investigation of the alleged corrupt activity. The Library may, however, consider an employee's voluntary choice to report his or her own misconduct relevant to determining the appropriate discipline relating to such misconduct, if any.

If a Reporter believes that he or she has been retaliated against because of whistle blowing activity, the Reporter may file a claim with the Connecticut Commission on Human Rights and Opportunities or other appropriate government agency.

5. Good Faith

Anyone making a report of suspected alleged corrupt activity must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as serious disciplinary offenses.

6. Compliance Officer's Responsibilities to Report Out

The Compliance Officer shall advise the Board's Executive Committee of all complaints and their resolution on an ongoing basis.

On an annual basis, the Compliance Officer shall report to the full Board on all complaints of alleged corrupt activity.

7. Copy of Policy Provided to Employees

Each employee to whom this Policy Statement applies shall be provided with a copy of this Policy Statement.

**ACKNOWLEDGEMENT OF RECEIPT
OF WHISTLEBLOWER POLICY STATEMENT**

By signing below, I acknowledge that I have received and read the foregoing
Whistleblower Policy Statement.

Signature

Print name here

Date

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