



## **Greenwich Library Policy**

### **Non-Town Employee Whistleblower**

**Approved October 13, 2020**

#### **Applicability**

The Greenwich Library (the “Library”) has established the procedures in this Whistleblower Policy (this “Policy”) that employees of the Trustees’ office or the Friends of Greenwich Library (each, a “Reporter”) may use to make reports of “corrupt activity” (as explained below). The reporting of corrupt activity by Town of Greenwich (“Town”) employees is governed by the Town’s separate whistleblower guidelines. This Policy describes the reporting process as well as the Library’s protection of employees from harassment, discrimination, retaliation or other adverse employment consequence in the event an employee reports such activity. Each employee to whom this Policy Statement applies shall be provided with, and acknowledge receipt of, a copy of this Policy.

Nothing in this Policy shall preclude any Library employee from reporting corrupt activity to an appropriate government agency such as the Town Attorney for the Town of Greenwich or the Connecticut Attorney General’s office, either in addition to or instead of reporting such activity in accordance with this Policy.

“Corrupt activity” means any actual or suspected mismanagement, dishonesty, fraud, neglect or unauthorized use with respect to Library assets, falsification of records, misconduct, or violation of laws or Library policies by the Library or its employees, trustees, officers or volunteers.

#### **Reporting Process**

A Reporter who has knowledge of actual or potential corrupt activity may report such activity to the President of the Library’s Board of Trustees (the “President”) at [president@greenwichlibrary.org](mailto:president@greenwichlibrary.org), (203) 622-7900, or Greenwich Library Main Branch, 101 West Putnam Avenue, Greenwich, CT 06830, Attn: Board of Trustees President. If such activity involves the President, the Reporter may instead report such Activity to the Chair of the Policy Committee at [policychair@greenwichlibrary.org](mailto:policychair@greenwichlibrary.org).

Reports of corrupt activity should be made in good faith, with reasonable grounds for believing that the corrupt activity occurred. Any allegations that prove to have been made maliciously, with reckless disregard or despite knowledge that such allegations were false will be considered serious disciplinary offenses. Reporters are reporting parties and should not attempt to investigate.

A Reporter may submit a report of actual or potential corrupt activity on an anonymous basis. In the case of an anonymous allegation, the Reporter must provide sufficient corroborating

evidence to justify the commencement of an investigation because (i) the President or other party receiving the report will not be able to contact such Reporter for additional information and (ii) it will be more difficult to evaluate the credibility of any allegations. An investigation of unspecified wrongdoing or broad allegations will not be undertaken without verifiable evidentiary support.

### **Investigation of Alleged Corrupt Activity; Board Notification**

The President or other party receiving the report will notify the Reporter that the report has been received. The President or other party receiving the report will take reasonable steps to ensure that all reports of corrupt activity, whether reported anonymously or not, are treated confidentially to the extent practicable, consistent with the need to conduct an adequate investigation. All reports will be promptly considered for investigation and, if appropriate, will be investigated under the direction of the President and the Board. The Chairman of the Friends of Greenwich Library (the "Friends") will be notified and consulted in connection with any reports made by or involving an employee of the Friends. Appropriate corrective action will be taken if warranted by the investigation and any suspected unlawful conduct or activity may be reported to law enforcement authorities.

The President shall advise the Board's Executive Committee promptly on an ongoing basis of all complaints and their resolution. The President shall report to the full Board annually on any complaints of alleged corrupt activity.

### **Protection of Reporters**

The Library will not retaliate, or support retaliation, against a Reporter, and will take reasonable steps to protect a Reporter 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 corrupt activity, nor shall making a report excuse the Reporter from cooperating with any investigation of the corrupt activity. The Library may, however, consider a Reporter's voluntary reporting of the Reporter's own misconduct relevant to determining the appropriate discipline, if any, relating to such misconduct.

If a Reporter has been retaliated against as a result of such individual's reporting of corrupt activity, the Reporter may file a claim with the Connecticut Commission on Human Rights and Opportunities or other appropriate government agency.

**ACKNOWLEDGEMENT OF RECEIPT OF NON-TOWN EMPLOYEE WHISTLEBLOWER POLICY**

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

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Signature

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Print name here

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Date