

## **Allegan District Library Whistleblower Policy**

### **General**

The Allegan District Library requires directors, trustees, officers 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 Allegan District Library, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all directors, trustees, officers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

### **No Retaliation**

No director, trustee, officer or employee who in good faith reports an ethics violation shall suffer harassment, retaliation or adverse employment 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 Whistleblower Policy is intended to create an Open Door Policy for compliance issues, and to encourage and enable employees and others to raise serious concerns within the Allegan District Library prior to seeking resolution outside of the Allegan District Library.

### **Reporting Violations**

The Allegan District Library has an Open Door Policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, the Library Director is in the best position to address an area of concern. This chain of command is important for the effective operation of the Allegan District Library and should be followed as the first course of communication. However, if employees are not comfortable speaking with the Director, or are not satisfied with the Director's response, they are encouraged to speak with any member of the Board of Trustees that they are comfortable in approaching. The Library Director, supervisors, and managers are required to report suspected ethics violations to the Board President, who acts as the Library's Compliance Officer. The Compliance Officer has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, theft, or alleged criminal activity an employee may be uncomfortable in reporting such acts to the Library Director under the Allegan District Library's Open Door Policy, those individuals should contact Compliance Officer directly.

### **Compliance Officer**

The Allegan District Library's Compliance Officer is responsible for receiving, investigating and resolving all reported complaints and allegations concerning violations and, at their discretion, will advise the Board of Trustees. The Compliance Officer will chair any investigation or resolution committee formed to address the reports and allegations

### **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. For alleged financial violations or irregularities, the current Allegan District

Approved by the Board of Trustees on December 16, 2014

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This document is based on a template from the National Council of Nonprofit Associations.

Library Financial Auditor may be consulted consistent with the need for good accounting and auditing practices.

**Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation 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, which prove to have been made maliciously or knowingly to be false, will be viewed as a serious disciplinary offense.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. All reports, complaints, and allegations of violation will be reported to the Allegan District Library Compliance Officer.

**Handling of Reported Violations**

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

Allegan District Library Compliance Officer:

Susan Buese  
1286 Bridge Road  
269-673-4241  
[suebuese@gmail.com](mailto:suebuese@gmail.com)

Allegan District Library Director

Pamela Armstrong  
Allegan District Library  
269-673-4625  
[parmstrong@alleganlibrary.org](mailto:parmstrong@alleganlibrary.org)

**Adoption**

The Allegan District Library Whistleblower Policy was approved by the Allegan District Library Board of Trustees at its regularly scheduled meeting on \_\_\_\_\_. It goes into effect immediately.

Witness its Secretary \_\_\_\_\_.

Witness its President \_\_\_\_\_.

Update review: every year after Board elects new officers.

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