

BETHEL PARK PUBLIC LIBRARY

POLICY NUMBER: 113

TITLE: Whistleblower Policy

DATE ISSUED: November 2009

PURPOSE: To provide a mechanism for employees and others to raise good-faith concerns

regarding suspected violations of law on the part of BPPL, to cooperate in an inquiry or investigation by a court, agency, law enforcement, or other governmental body, or to identify potential violations of BPPL policy; and to prohibit retaliation against members who take such actions.

STATEMENT OF POLICY

1. It is the responsibility of all trustees, officers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.
2. No 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.
3. BPPL has an open door policy and encourages employees to share their questions, concerns, suggestions or complaints with their immediate supervisor. However, if an employee is not comfortable speaking with his/her immediate supervisor or is not satisfied with the response of the immediate supervisor, the employee is encouraged to speak to another supervisor or the Director.
4. Supervisors and the Director are required to report suspected ethics violations to the BPPL Compliance Officer, who is the chair of the Finance Committee. For suspected fraud, or when an employee is not satisfied or uncomfortable with following the open door policy of BPPL, he/she should contact the Compliance Officer directly.
5. The BPPL Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations and, at his/her discretion, shall advise the Director and/or the Finance Committee.
6. The BPPL Finance Committee of the board of directors 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.
7. 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 and which prove to have been made maliciously or knowingly to be false will be treated as a serious disciplinary offense.

8. Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.
9. Upon receiving a complaint, the Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days.
10. All reports will be promptly investigated and appropriate corrective action will be taken if warranted.