

Whistleblower Protection Policy

Hartford Public Library (HPL) requires Board members, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Hartford Public Library, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

A whistleblower as defined by this policy is a Board member, volunteer or employee of HPL who reports an activity that they consider to be illegal or dishonest to one or more of the parties specified in this Policy. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures; appropriate management officials are charged with these responsibilities.

Examples of illegal or dishonest activities include but are not limited to violations of federal, state or local laws; billing for services not performed or for goods not delivered or other fraudulent financial reporting, or questionable ethical activity related to HPL operations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise concerns internally so that Hartford Public Library can address and correct inappropriate conduct and actions. It is the responsibility of all board members, employees, and volunteers to report concerns about suspected violations of Hartford Public Library policies, laws or regulations that govern Hartford Public Library's operations.

No Retaliation

It is contrary to the values of Hartford Public Library for anyone to retaliate against any board member, , employee or volunteer, who in good faith reports a violation, or a suspected violation of the law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Hartford Public Library. 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. Board members who retaliate against someone who has reported a violation in good faith may be subject to censure or removal from the board. Volunteers who retaliate will lose their volunteer positions.

Reporting Procedure

Hartford Public Library has an open-door policy and suggests that employees share their questions, concerns, suggestions, or complaints with their supervisor. If the employee is not comfortable speaking with

their supervisor, or is not satisfied with the supervisor's response, the employee is encouraged to speak with the Chief Administrative Officer, the Human Resources Director or anyone in a position to take the appropriate action. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Library's Chief Administrative Officer, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Chief Administrative Officer or the Human Resources Director.

If a Board member or volunteer wants to report a complaint or concern about suspected ethical or legal violations, they should contact the Library's Chief Administrative Officer or Board Chair.

A confidential hotline and web reporting tool operated by an independent third-party will be made available for any employee, board member, volunteer or other interested party to report suspected illegal or unethical behavior or any suspected violation of HPL policies including the Anti-Harassment Policy. While HPL encourages employees, Board members or volunteers to report any actual or potential illegal activity in accordance with the reporting processes outlined above, neither the reporting procedure above, nor any other HPL policies are intended to prohibit employees, Board members or volunteers from reporting any illegal activities to government agencies or law enforcement authorities, cooperating with such agencies or authorities, or participating in any government whistleblower programs.

Chief Administrative Officer

The Hartford Public Library's Chief Administrative Officer is responsible for ensuring that all complaints about unethical or illegal conduct are treated confidentially, investigated, and resolved. They shall have the authority to designate a third party to receive, investigate, and respond to complaints based on their professional opinion. The Chief Administrative Officer will advise the CEO, Board Chair and Chair of the Audit Committee and/or the Board of Directors of all complaints and resolutions at least annually.

Accounting and Auditing Matters

The Chief Administrative Officer shall immediately notify the Chair of the Audit Committee of any concerns or complaints regarding corporate accounting practices, unusual expenses, alleged financial improprieties, internal controls or auditing and work with the committee until the matter is resolved.

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 and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. Management action may be taken up to and including termination.

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.

Handling of Reported Violations

Hartford Public Library's Chief Administrative Officer, Chair of the Audit Committee or Board Chair will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted, including referral of the matter to law enforcement agencies.

Questions about the policy should be addressed to:

Chief Administrative Officer

500 Main Street

Hartford, CT 06103-3075

Telephone: 860-695-6312

[Whistleblower hotline](#)

Approved by the Board of Directors on December 5, 2013.

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Replacing Policy Effective: N/A

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