

UHLS: Whistleblower Policy

The Board of Trustees of the Upper Hudson Library System, a corporation created by a charter granted under Section 255 of the New York State Education Law by the Regents of the University of the State of New York, on June 16th, 1989, approved the following **Whistleblower Policy** at their meeting on October 8, 2014.

I. PURPOSE

The Upper Hudson Library System (UHLS) is committed to maintaining an environment where members of the UHLS Board of Trustees, members of UHLS Board Committees and all UHLS employees are free to raise good faith concerns regarding the business practices of UHLS, including but not limited to:

- a. Reporting suspected violations of law;
- b. Providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body;
- c. Identifying actual or potential violations of the UHLS bylaws and policies.

II. REPORTING A VIOLATION

Members of the UHLS Board of Trustees, members of UHLS Board Committees and UHLS employees should raise concerns with, and report violations to the UHLS Board President or the UHLS Executive Director. If the concerns are with or about either of those parties, the individual should address concerns to any other member of the UHLS Board of Trustees. If for any reason an individual does not feel comfortable reporting the problem to those parties, they may bring the matter directly to the UHLS Board of Trustees as a whole. This Whistleblower Policy shall not apply to allegations made with reckless disregard for their accuracy. People making such allegations may be subject to disciplinary action by UHLS.

III. NO RETALIATION

UHLS expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against any member or employee who raises suspected violations of law, cooperates in inquiries or investigations, or identifies potential violations of UHLS policies or Bylaws. Any member of the UHLS Board of Trustees, UHLS Board Committee member or any UHLS employee who engages in retaliation will be subject to discipline, up to and including removal or termination.

Any member of the UHLS Board of Trustees, UHLS Board Committee member, or any UHLS employee who believe that they have been subjected to any form of retaliation as a result of reporting a suspected violation of law or policy should immediately report the retaliation to the UHLS Board President or the UHLS Executive Director. If the concerns are with or about either of those parties, the individual should address concerns to any other member of the UHLS Board of Trustees. If for any reason an individual does not feel comfortable reporting the problem to those parties, they may bring the matter directly to the UHLS Board of Trustees as a whole.

IV. INVESTIGATION

Reports of suspected violations of law or the UHLS Bylaws or policies or reports of retaliation will be investigated promptly and in a manner intended to protect confidentiality, consistent with a full and fair investigation. The UHLS Board President or the UHLS Executive Director will conduct or designate other internal or external parties to conduct the investigations. The investigating parties will notify the concerned individuals of their findings, and prepare other reports as indicated by the circumstances. A summary of all such reports will be presented to the UHLS Board of Trustees.

In the event that a report of a suspected violation of law or policy or retaliation involves the UHLS Board President or the UHLS Executive Director, the Vice-President of the UHLS Board of Trustees will conduct the investigation, or designate a third party to conduct the investigation.

V. CONFIDENTIALITY

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.

VI. DISTRIBUTION

This policy shall be distributed to all members of the UHLS Board of Trustees, UHLS Board Committees and all UHLS employees. The policy will also be included in the UHLS Staff Manual.