Reviewed and Approved: 07/15/2025

INDIAN RIVER AREA LIBRARY

Whistleblower Policy

1. STATEMENT of PURPOSE

The *Indian River Area Library* ("Library") is committed to the highest standards of conduct and ethics. It is the responsibility of all trustees, officers, and employees to report violations of the law or applicable rule or regulation or suspected violations in accordance with the Michigan Whistle Blowers Policy Act (PA 469 of 1980). The Library will investigate suspected inappropriate behavior or misuse of Library resources by employees, trustees, or volunteers; communicate a reporting process; and provide safeguards against retaliation for the reporting entity.

2. INAPPROPRIATE WORKPLACE BEHAVIOR

Inappropriate workplace behavior as enumerated in the **Code of Conduct Policy**, **Employee Handbook**, and the **Administration Policy**, fraudulent or dishonest use or misuse of Library resources or property with the intent of obtaining an unauthorized benefit includes (but is not limited to) the following:

A. Rude or inappropriate behavior to or harassment of patrons and other employees.
B. Possessing, using, or being impaired by or having one's performance affected by intoxicating beverages, narcotics, or controlled or illegal substances on Library property.
C. Engaging in criminal conduct whether or not related to job performance.
D. Forgery or alteration of documents.
E. Unauthorized alteration or manipulation of files.
F. Fraudulent financial reporting.
G. Misappropriation or misuse of resources, such as funds, supplies, or other assets.
H. Authorizing or receiving compensation for goods not received or services not performed.
I. Authorizing or receiving compensation for hours not worked.
J. Theft at Point of Sale.

3. 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**.

4. NO RETALIATION

No director, trustee, officer, or employee who in good faith reports an ethics violation shall suffer harassment, retaliation, or adverse employee 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. The Library has an Open-Door Policy for compliance issues and to

encourage and enable employees and others to raise serious concerns within the *Indian River Area Library* prior to seeking resolution outside of the *Indian River Area Library*.

5. REPORTING VIOLATIONS

The Library 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 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 and any supervisors 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.

6. COMPLIANCE OFFICER

The *Indian River Area 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. The Library, at its discretion, may work with an auditor, attorney, or other independent persons in reviewing and analyzing the report.

7. 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.

8. 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 and the law. All reports, complaints, and allegations of violation will be reported to the Compliance Officer.

9. 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. The Library Director or Board of Trustees shall document a summary of the receipt, retention, investigation, outcome of the initial report and any corrective action taken. The whistleblower entity will be updated as appropriate.