THE SCHULTZ-HOLMES DISTRICT LIBRARY

Whistleblower Policy – Schultz-Holmes District Library

The Library is committed to the highest standards of openness, honesty, and accountability. In consideration of that commitment, the Library expects employees and others with serious concerns about any aspect of the Library's ongoing operations to come forward and voice those concerns. This Whistle-Blowing Policy is intended to encourage and enable employees to raise serious concerns within the Library without fear of retaliation.

Employees are often the first to realize that there may be something seriously wrong within the Library. However, they may refrain from expressing their concerns because they feel speaking up would be disloyal to their colleagues. They may also fear harassment or victimization.

1. **SCOPE**

   This policy aims to:

   - Provide avenues for employees to raise concerns and receive feedback on any action taken
   - Reassure employees that when providing information in good faith they will be protected from retaliation or victimization
   - Inform employees how to take the matter further, if they are dissatisfied with the response

   This Whistle-Blowing Policy is intended to cover concerns of any employee or of any individual closely involved in the operations of the Library. These concerns may be about something that:

   - Is unlawful
   - Violates the Library's stated policies
   - Falls below established standards of practice
   - Represents improper conduct

2. **SAFEGUARDS**

   The Library recognizes that the decision to report a concern can be a difficult one to make, possibly because of the fear of retaliation from those responsible for the misconduct.

   The Library will not tolerate harassment or victimization and will take action to protect those who raise a concern in good faith.

   Every effort will be made to protect an individual's identity if they report a concern and do not want their name disclosed. The investigation process, however, may reveal the source

of the information, and/or a statement by the individual may be required as part of the evidence.

Individuals are encouraged to put their names to allegations. Concerns expressed anonymously are much less powerful, but they may be considered at the discretion of the Library. In exercising this discretion, the factors to be considered include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegations from attributable sources

If an allegation is made in good faith, but is not corroborated by the investigation, no action will be taken against the originator of the allegation. If individuals make malicious allegations, disciplinary action may be considered against the individual.

3. RAISING A CONCERN

For less serious issues, employees should normally raise concerns with the Library's director. In general, however, the Whistle-Blowing Policy should be applied for issues that are potentially more serious and/or sensitive. The first step is to approach the Library director. If the subject of the allegation happens to be the director, then the President of the Library Board of Trustees should be contacted. In all cases, an initial investigation will determine whether or not a full investigation is required.

Concerns should be reported in writing under the Fraud, Theft and Corruption Disclosure Form (SEE EXHIBIT 1). These forms can be obtained confidentially from the Library Director or any member of the Library Board of Trustees. The document is available electronically on the Library's shared drive, and hard copies are available in the Library's staff workroom. The background and history of the issue, together with pertinent dates, should be included on the form. Include as much detail as possible, including the reason why the individual suspects fraud, theft, or corruption. The earlier the concern is reported, the easier it is to investigate and take action. Although employees are not expected to prove the truth of an allegation, they will need to demonstrate that there are sufficient grounds for concern.

4. HANDLING OF COMPLAINTS

The action taken by the Library will depend on the nature of the concerns. The matters raised may be investigated internally and/or by the police.

The amount of contact between the investigator and the originator of the complaint will depend on the nature of the issues raised, the potential difficulties involved, and the clarity

of the information provided. The Library will take steps to minimize any difficulties that the originator of the complaint may experience as a result of their concern.

Allegations will be addressed as follows depending on the nature of the allegation:

- An internal investigation by the Library Director, the Library Board of Trustees, or an external auditor
- Referral of criminal matters to the police

The complainant will receive, within ten (10) working days of a concern being received, written communication:

- Acknowledging that the concern has been received
- Indicating how the matter will be handled
- Giving an estimate of how long it will take to provide a final response
- Telling them the status of the initial investigation
- Telling them if any further investigation will take place, and if not, why

The investigation will be planned with consideration to the following:

- Resources required to investigate the allegation
- Legal status of the allegation (e.g. theft or breach of procedure)
- Internal disciplinary procedures
- Level of evidence required
- Protection of data and documents required; in compliance with the Library Privacy Act
- Minimization of the effect on employees and others
- Recovery of lost funds and minimizing the potential for further loss
- Review of any improvements required to prevent re-occurrence

The Library appreciates that individuals who report the alleged fraud, theft, or corruption need to be assured that the matter has been properly addressed. Thus, where appropriate and subject to legal constraints, they will receive information about the outcome of any investigation.

If the allegation of fraud, theft, or corruption directly impacts another organization, the highest ranking officer at that organization will be informed.

Adopted by the Schultz-Holmes District Library, July 2025

EXHIBIT 1

Fraud, Theft, and Corruption Disclosure Form

Shultz-Holmes District Library (SHDL) is committed to the highest standards of openness, honesty, and accountability. In consideration of that, SHDL expects employees and others with serious concerns about any aspect of the Library's ongoing operations to come forward and voice those concerns.

Please complete this form as accurately and with as much detail as possible. Attach additional forms or extra sheets if needed and then submit all documents to the Library Director or, if the allegation involves the Library Director, to the President of the Library Board.

Name (of person filing report): _____

Phone Number (of person filing report): _____

Email: (of person filing report): _____

Best Times to be Reached: _____

Nature of Concern: _____
_____
_____
_____
_____

Related Background Information: _____
_____
_____
_____
_____

Names and Positions of People Involved:

Name of Person	**Position of Person**
_____	_____
_____	_____
_____	_____
_____	_____