

Brainerd Memorial Library Association, Inc. Whistleblower Policy

I. General

The Brainerd Memorial Library Association, Inc. (henceforward, "Library") requires trustees, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Library we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

II. Reporting Responsibility

It is the responsibility of all trustees, officers and employees to report ethics violations or suspected violations in accordance with this Whistleblower Policy.

III. No Retaliation

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. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the Library prior to seeking resolution outside the Library.

IV. Reporting Violations

The Library has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor is in the best position to address an area of concern. Employees who are not comfortable speaking with their supervisor or who are not satisfied with their supervisor's response, are encouraged to speak with anyone in management whom they are comfortable approaching. Supervisors and managers are required to report suspected ethics violations to the Library's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when not satisfied or uncomfortable with following the Library's open door policy, individuals should contact the Library's Compliance Officer directly.

V. Compliance Officer

The Board of Trustees shall appoint one member of the Personnel & Policies Committee to serve as the Library's Compliance Officer for the duration of his term on the committee. Assisted by the other members of the Personnel and Policy Committee, the Compliance Officer is responsible for investigating and resolving all reported complaints and allegations concerning violations. The Committee, at its discretion, shall advise the Director or the Board of Trustees. The Compliance Officer has direct access to the Board of Trustees and is required to report to the Board of Trustees at least annually on compliance activity. Concerns or complaints may be brought to the attention of any member of the Personnel and Policy Committee, which will then convene with the Compliance Officer to discuss the issue.

VI. Accounting and Auditing Matters

The Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing, in conjunction with the Compliance Officer.. The Compliance Officer shall immediately notify the President of the Board of any such complaint and work with the President of the Board and the Finance committee, as appropriate, until the matter is resolved.

VII. 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.

VIII. 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.

IX. Handling of Reported Violations

The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Approved by the Board of Trustees: May 25, 2010

----- For Year 2010-2011 -----

Compliance Officer:

Raul de Brigard 860-345-2330
Brainerd Memorial Library Association, Inc.

Personnel and Policy Committee Members:

Raul de Brigard 860-345-2330
Mary Carrellas 860-345-4319
Melissa Cavrell 860-345-8292
Betsy Clifford 860-345-2578

Brainerd Memorial Library Association, Inc. Management Staff:

Edward Munster, President Board of Trustees
Cynthia Muhlbach, Director

This policy was adapted from the National Council of Nonprofit Associations sample policy.