General
Joseph T. Simpson Public Library’s Ethical Guidelines and Conflict of Interest policy require directors, 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 organization, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility
It is the responsibility of all library directors, trustees, employees, and volunteers to comply with the Ethical Guidelines and Conflict of Interest policy and to report violations or suspected violations in accordance with this Whistleblower Protection policy.

No Retaliation
No director, officer, or employee who in good faith reports a violation of the Ethical Guidelines or Conflict of Interest policy 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 Protection policy is intended to encourage and enable employees and others to raise serious concerns within the organization prior to seeking resolution outside the organization.

Reporting Violations
The Ethical Guidelines and Conflict of Interest policy addresses the Joseph T. Simpson Public Library’s open-door policy and suggests that employees, volunteers and trustees 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. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor’s response, you are encouraged to speak with your Executive Director, or your library board’s chair, or the chair of your library board’s finance or audit committee.

Supervisors and managers are required to report suspected violations of the Ethical Guidelines or Conflict of Interest policy to their library board chair or chair of the library board finance or audit committee. These individuals have specific responsibilities to investigate all reported violations.

For suspected fraud, or when you are not satisfied or uncomfortable with following the organization’s open-door policy, individuals should contact the library board chair or library board finance or audit committee chair directly.
Compliance Officer

The library board chair or chair of the library board finance or audit committee is responsible for investigating and resolving all reported complaints and allegations concerning violations of the Ethical Guidelines and Conflict of Interest policy, at his or her discretion, shall advise the Executive Director and/or the library board. The library board chair or chair of the library board finance or audit committee are required to report to the library board at least annually on compliance activity.

Accounting and Auditing Matters

The finance or audit committee of the board shall address all reported concerns or complaints regarding library accounting practices, internal controls, or auditing. The library board chair or chair of the library board finance or audit committee should immediately notify the finance or audit committee of any such complaint and work with the designated committee until the matter is resolved.

Acting in Good Faith

Anyone filing a complaint concerning a violation or suspected violation of the Ethical Guidelines or Conflict of Interest policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Ethical Guidelines for Library Employees and Officials. 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.

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.

Handling of Reported Violations

The library board chair or chair of the library board finance or audit committee will notify the sender and acknowledge receipt of the reported violation or suspected violation within 30 business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

CONTACTS:

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* The Cumberland County Library System’s Whistleblower Policy (revised 12/14/2009) was modified to meet the specific needs of Joseph T. Simpson Public Library.