The Westchester Academic Library Directors Organization (WALDO) is committed to the highest possible legal, ethical, and moral standards of conduct and requires its Board Members, officers, employees and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of WALDO, we must practice honesty and integrity in fulfilling our responsibilities and complying with all applicable laws and regulations. In this spirit, WALDO encourages its Board Members, officers, employees, and volunteers to identify any instances in which these standards may be compromised.

The Whistleblower policy has been established to provide a means for Board Members, officers, employees, and volunteers to raise good faith concerns about behavior that appears to be illegal, dishonest, unethical, fraudulent, or in violation of any adopted policy of WALDO. A Whistleblower is the Board Member, officer, employee, or volunteer reporting such activity.

The Executive Board provides oversight for implementing this policy. The President of the Executive Board is responsible for administering this policy, including taking in complaints and reporting concerns to the Executive Board for review and disposition.

A copy of the Policy will be distributed to all Board Members, officers, and employees, and to volunteers who provide substantial services to WALDO. Each such person is responsible for complying with the Policy and reporting any concerns regarding suspected improper activities in accordance with the procedures set forth in this policy.

**Reporting Violations**

Questions, concerns, suggestions or complaints regarding the ethical and legal standards noted above should be addressed to the President of the Executive Board. If the Whistleblower does not feel comfortable reporting the information to the President, he or she is expected to report the information to the Vice-President/President Elect.

**Handling of Reported Violations**

The President of the Executive Board (or the Vice-President/President Elect, if the matter concerns the President) will notify the Executive Board that a concern has been raised. The President (or the Vice-President/President elect, as appropriate) will appoint a committee of not less than three members of the Executive Board to investigate all reported concerns related to the ethical and legal standards noted above. The committee will report to the President (or the Vice-President/President elect) of the progress of their work until their investigation is complete.

All reports will be promptly investigated. The Executive Board shall take appropriate corrective action if warranted by the investigation.

If no action is warranted, the minutes of the Executive Board will only note the fact that a complaint was made and investigated, and no action was found to be needed. If action is taken, the nature and disposition of the case will be fully reflected in the minutes.

To the extent possible—as reporting may be done anonymously—the President (or the Vice-President/President elect, as appropriate) will communicate next steps to the Whistleblower within five business days of receipt of a reported or suspected violation. To the extent possible, the President (or the Vice-President/President elect) will inform the Whistleblower of the final disposition of the case.

**No Retaliation**
No Whistleblower who in good faith reports a concern shall suffer harassment, retaliation, or adverse employment consequence. WALDO prohibits any form of intimidation, harassment, discrimination, or other retaliation, or other adverse employment consequence toward a Whistleblower in response to a good faith allegation under this Policy.

Any person who retaliates against a Whistleblower or other individual who assists in the investigation is subject to appropriate disciplinary and corrective action, up to and including termination of employment in the case of an employee. This Whistleblower Policy is intended to encourage and enable concerns to be raised within WALDO prior to seeking resolution outside the organization.

**Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the ethical and legal standards noted above must act in good faith and have reasonable grounds for believing the information disclosed may indicate a violation of such standards. Any allegation that proves to have been made with malicious intent or made frivolously will be viewed as a serious matter and will carry the potential for disciplinary action.

**Confidentiality**

Violations or suspected violations may be submitted on a confidential or anonymous basis by the complainant. Any investigation will be conducted in a manner that conceals and protects the Whistleblower’s identity to the greatest extent possible, consistent with the need to conduct a fair and adequate investigation.

Adopted by WALDO Executive Board on April 20, 2015.