



Whistleblower Policy and Procedures

The Detroit Public Library (“Organization”) is committed to the highest standards of conduct and ethics. The Organization will investigate suspected fraudulent or dishonest use or misuse of the Organization’s resources or property by staff, board members, consultants or volunteers. All staff, board members and volunteers are encouraged to report suspected fraudulent or dishonest conduct in accordance with the procedures below.

Reporting.

A person with concerns regarding the Organization’s accounting, internal accounting controls, auditing matters, or fraudulent or dishonest use or misuse of the Organization’s resources or property may report their concerns in writing to the Chair of the Audit Committee (the “Administrator”), the Director/CEO of the Organization, or to that person’s supervisor. The Director/CEO and all supervisors should forward all such complaints to the Administrator.

Review Process.

The Administrator will forward the complaint to the Audit Committee (the “Committee”). The status of all pending complaints will be reviewed at each regularly scheduled Committee meeting. Such discussions will be held without Organization staff or outside auditor personnel present unless requested by the Committee. Within 10 days following the meeting, the Administrator shall forward to legal counsel a list of each complaint received by the Committee Chairperson. Whistleblower complaints will be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law.

Investigation.

At the direction of the Chairperson, one or more members of the Committee or legal counsel may be delegated the authority to investigate the complaint. Delegation decisions will be made on a case-by-case basis, depending on the nature and significance of the complaint and the need to maintain confidentiality and anonymity. Supervisors receiving notice of a complaint should not contact the suspected person, or perform any investigative or other follow-up steps unless otherwise directed by the Committee or the Organization’s legal counsel. All persons aware of suspected conduct should not discuss the matter with outside counsel, the media, or any other persons except as directed by the Committee or legal counsel.

Legal Privilege.

The Committee will involve legal counsel or other outside counsel in such investigation in order to maintain, to the extent possible, attorney-client, work product and other legal privilege with respect to any documents or other materials received or prepared in connection with the investigation of any complaint.



Responsibilities.

All parties should use reasonable care to avoid baseless allegations that are made with reckless disregard for their truth or falsity. People making such allegations may be subject to disciplinary action and/or legal claims by individuals accused of such conduct.