

THE SCHOOL LIBRARY ASSOCIATION OF NEW ZEALAND AOTEAROA TE PUNA WHARE MÅTAURANGA A KURA

Whistle-blower policy

Purpose and Scope

- It is the policy of SLANZA, to obey all laws governing its operations. All SLANZA agents will obey all laws in conducting association business, at all times. SLANZA has adopted this policy to encourage its employees and volunteers to report any suspected violations of law, accounting irregularities, violations of internal accounting controls, improper auditing matters, fraud, violations of the Code of Conduct described above, or any other suspected wrongdoing by any SLANZA agents.
- 2. This policy provides a means whereby agents of SLANZA can safely raise, internally and at a high level, serious concerns and disclose information that they believe in good faith constitutes any such wrongdoing by SLANZA agents.
- 3. This policy does not apply to employment-related grievances concerning the terms and conditions of employment or any complaints that are addressed by the 15 against discrimination and harassment.

Reporting Procedure

- 4. If you believe in good faith that any SLANZA agent has engaged in any such wrongdoing, then you should promptly report your concerns in writing to the National Administrator or any SLANZA Board member.
- 5. In the event, you have concerns about the SLANZA Board as a whole, then the report should be made to the Chair of any regional SLANZA committee. If you believe that this individual may have a conflict of interest related to the matter, then you should report your concerns in writing to the SLANZA Chair.
- 6. All agents of SLANZA should respect the lines of authority described in this policy, follow the reporting procedures described above, and not approach other persons about such concerns.
- 7. All reports should be factual rather than speculative or conclusory and contain as much specific information as possible to allow for proper assessment of the nature, extent and urgency of preliminary investigative procedures.

Anonymous Reports

- 8. SLANZA encourages whistleblowers to put their name on any report they make under this policy, but any whistleblower can also make an anonymous report. Anonymous whistleblowers must provide sufficient corroborating evidence to justify the commencement of an investigation.
- 9. An investigation of unspecified wrongdoing or broad allegations will not be undertaken without verifiable evidentiary support. Because investigators are unable to interview anonymous whistleblowers, it may be more difficult to evaluate the credibility of the allegations and, therefore, it may not be appropriate to initiate a formal investigation under such circumstances.

Initial actions on receipt of a protected disclosure

10. All protected disclosures received must be immediately advised to the Board.

- 11. The Board shall receive any protected disclosure with an open mind and give the disclosure full consideration. If appropriate, the board should require an investigation into the alleged wrongdoing.
- 12. A decision not to investigate alleged serious wrongdoing must be recorded in writing and does not prevent SLANZA from taking further action in relation to matters raised in the protected disclosure.
- 13. The Board must, within 20 working days from the date of the disclosure, notify the person who made the protected disclosure, whether or not the alleged wrongdoing will be investigated.

Investigations

- 14. The process of any investigation will depend on the nature of the alleged wrongdoing.
- 15. Any investigation will be conducted as quickly as possible, taking into account the nature and complexity of the report and the issues raised.
- 16. All agents who are interviewed, asked to provide information or otherwise participate in an investigation of a report, have a duty to fully cooperate with the investigators.
- 17. Any participants should refrain from discussing or disclosing any details of the investigation or their testimony with anyone not connected to the investigation. In no event should participants discuss anything related to the investigation with the person being investigated, unless agreed to by the investigators.
- 18. All participants are entitled to protection from retaliation for having participated in an investigation. Requests for confidentiality by participants will be honored to the extent practicable or advisable.
- 19. If on preliminary examination, the concern, issue or facts raised or alleged in any report are judged to be wholly without substance or merit, then the matter shall be dismissed, and the whistleblower informed of the decision and the reasons for such dismissal.
- 20. If it is determined that the allegations or suspicions in the report have merit, then the matter shall be dealt with in accordance with this policy, or as otherwise deemed appropriate under the circumstances. Based on the results of the investigation, the Board will take appropriate corrective action as warranted.
- 21. The results or outcome of the investigation will be reported to the whistleblower.

Confidentiality

- 22. SLANZA will treat all reports received as confidential and privileged to the fullest extent permitted by law, except as specifically provided in this policy.
- 23. SLANZA will exercise particular care to keep confidential the identity of anyone who files a report until a formal investigation is launched. Thereafter, the identity of the whistleblower may be kept confidential, if requested, unless:
- a. confidentiality is incompatible with a fair investigation,
- b. there is an overriding reason for identifying or otherwise disclosing the identity of the individual, or
- c. disclosure is required by law.
- 24. Under these circumstances, the whistleblower will be informed in advance of his or her being identified with the report.

Protection from Retaliation/Penalties

- 25. SLANZA strictly prohibits and will not tolerate any retaliation or retribution, directly or indirectly, against anyone who in good faith reports any suspected wrongdoing in accordance with the procedures described in this policy, or who participates in, provides information in connection with, or otherwise assists in the investigation of any incidents of alleged wrongdoing.
- 26. Anyone who engages in or encourages any such retribution or retaliation, directly or indirectly, will be subject to disciplinary action, up to and including immediate discharge.

27. The right to protection from retaliation does not extend immunity for any complicity in the matters that are the subject of the allegations or an ensuing investigation. Further, anyone who knowingly and intentionally provides false or misleading information regarding any alleged wrongdoing will be subject to disciplinary action, up to and including immediate discharge.