

**KEENE VALLEY LIBRARY ASSOCIATION
POLICY MANUAL
Adopted September 26, 2011, Revised March 18, 2024**

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POLICY FOUNDATIONS

Keene Valley Library MISSION STATEMENT Adopted April 22, 2013

The mission of the Keene Valley Library is to connect people to ideas, experiences, information, and the community in a comfortable, welcoming setting. We strive to do this through: Providing adults and children with a collection of current and relevant books, other media, and local Adirondack historical resources; Providing an inviting and lively cultural center for community events; Evolving as our community grows and technology advances.

LIBRARY BILL OF RIGHTS

The American Library Association affirms that all libraries are forums for information and ideas, and that the following basic policies should guide their services.

I. Books and other library resources should be provided for the interest, information, and enlightenment of all people of the community the library serves. Materials should not be excluded because of the origin, background, or views of those contributing to their creation.

II. Libraries should provide materials and information presenting all points of view on current and historical issues. Materials should not be proscribed or removed because of partisan or doctrinal disapproval.

III. Libraries should challenge censorship in the fulfillment of their responsibility to provide information and enlightenment.

IV. Libraries should cooperate with all persons and groups concerned with resisting abridgment of free expression and free access to ideas.

V. A person's right to use a library should not be denied or abridged because of origin, age, background, or views.

VI. Libraries which make exhibit spaces and meeting rooms available to the public they serve should make such facilities available on an equitable basis, regardless of the beliefs or affiliations of individuals or groups requesting their use.

VII. All people, regardless of origin, age, background, or views, possess a right to privacy and confidentiality in their library use. Libraries should advocate for, educate about, and protect people's privacy, safeguarding all library use data, including personally identifiable information.

Adopted June 19, 1939, by the ALA Council; amended October 14, 1944; June 18, 1948; February 2, 1961; June 27, 1967; January 23, 1980; January 29, 2019.

Inclusion of "age" reaffirmed January 23, 1996.

POLICY DEVELOPMENT

Policy development and policy revision often involve major decisions and considerable philosophical reflection. Boards must allow adequate time to discuss and assess policy options and ramifications. While trustees alone have the legal authority to make policy, the process works best when the library director and other key staff are closely involved. The staff has an important role in researching options, drafting recommendations, and presenting them to the board for discussion and approval.

When establishing new policy the board should seek from the director sufficient information to discuss the issue with confidence. This should include:

- A description of the issue that requires policy consideration;
- A statement describing how a policy would contribute to the accomplishment of the library's goals and objectives;
- A list of existing policies related to or affected by the proposed policy;
- A list of the policy options available, with appropriate analysis (including effects of enforcing the policy, legal ramifications, and costs to resources, facilities, and staff);
- A recommendation, accompanied by the justification for changes in any existing policies.

When any existing policy is under evaluation, the board should ask if it is:

- In compliance with all laws and regulations;
- Consistent with the library's charter, mission, goals, and plans;
- Consistent with the Library Bill of Rights and the Freedom to Read Statement;
- Complete, clearly written, and easily understandable;
- In the best interest of the community at large, devoid of politics, prejudice, or favoritism;
- Easily enforceable without undue burden on the library staff;
- Designed to maximize library services and access for the greatest number of users.

All policies should have the date of the board's approval and the date of revisions noted in the footer of the document. Regular review and revision is essential and required under Education Department [Regulations \(8 NYCRR\) § 90.2](#). Copies of the policy manual must also be housed in the library and be easily accessible by the staff and public. Posting public (external) policies on the library website is now required under Education Department [Regulations \(8 NYCRR\) § 90.2](#).

The director is responsible for instructing the staff about the policies that affect their work and assuring that they fully understand these policies. Staff members are on the front lines when a policy question arises, and it is essential that they are able to explain all policies to the public in a clear and effective manner and to apply them consistently.

From Handbook for Library Trustees of New York State, 2023

KEENE VALLEY LIBRARY ASSOCIATION POLICIES

Libraries have a responsibility to meet the information needs of everyone in their communities. To do so, they must promote and protect users' intellectual freedom and ensure that the delivery of library services to the community is fair, equitable, and non-discriminatory.

Policies have several functions in today's complex organizations. Their statements help define the values of the organization, and they help managers and staff translate those values into service priorities. Policies establish a standard for services that can be understood by users of the service and providers. Policies ensure equitable treatment for all, and policies provide a framework for delivery of services. When policies have been adopted by a library's governing agents in a formal process and are consistent with local, state, and federal laws, they will be enforceable.

I. PATRON SERVICES

1. Our users are not only our customers, but they are also the reason the Library exists. We provide quality service and treat all users fairly and equitably. Services are provided in an equitable manner that is sensitive to and supportive of human differences.
2. The library will serve all residents of the community and the public library system area. Service will not be denied or abridged because of religious, racial, social, economic, or political status, or because of mental, emotional, or physical condition, age, or sexual orientation.
3. The use of the library may be denied for due cause. Such cause may be failure to return library materials or to pay fines, destruction of library property, disturbance of other patrons, or any other illegal, disruptive, or objectionable conduct on library premises. Smoking, vaping, illicit drugs and alcohol are not permitted in the library or on the library grounds.
4. It is a patron's responsibility to maintain necessary and proper standards of behavior in order to protect their individual rights and the rights and privileges of other patrons. If a patron creates a public nuisance, that patron may be restricted from library use. Those who are unwilling to leave or do not leave within a reasonable amount of time, after being instructed to do so by the staff, will be subject to the law.

A. Children

1. The Keene Valley Library Association encourages visits by young children and it is our desire to make the visit both memorable and enjoyable for the child. Library staff are not expected to assume responsibility for the care of unsupervised children in the library. Caregivers are responsible for supervising their children's reading and behavior in the library and during library programs.
2. Children of all ages are encouraged to use the library for homework, recreational reading, and program attendance. The library staff realizes that the library will be noisier at busy times and that children by nature can cause more commotion. However, children (whether with caregivers or not) who are being continually disruptive will be given a warning that they must settle down or they will be asked to leave the library. If after a second warning the child continues to be disruptive, they will be asked to leave the library. If the child needs to contact a caregiver, they may do so and then wait with a staff person until the caregiver arrives.

B. Circulation of Library Materials

1. The entire resources of the Library are available to the Library patrons. Collections are developed for the reading abilities and special interests of children and young people as well as adults. Library personnel are available to provide guidance if requested.
2. To borrow books or other materials and to be on the Library's mailing list, a patron initially registers at the Front Desk by completing an application for a Clinton Essex Franklin Library System electronic user card. This card also permits the patron to use the Library's online services. The card is accepted in all CEFL system libraries.
3. Email addresses or other contact information will be used for library purposes only.
4. Reserve requests may be made in person, online or by telephone. Users will be notified when reserved material is available.
5. The Director may limit use of library services by groups or individuals when their behavior is deemed inappropriate or interferes with service to the general public.
6. The Director may limit borrowing privileges when there has been a failure to return materials or to pay the fine for overdue books and other library materials, destruction of library property, or other inappropriate conduct on library premises.
7. Patrons with concerns over library procedures or policies should first discuss their concerns with the Director. If the patron is not satisfied, or needs further clarification, the issue should then be discussed with the Board President.

C. Overdue Fines and Fees

1. The Keene Valley Library manages material for the use of all library patrons. Individuals are asked to check out only those materials that can be read or viewed and returned in a two week period. Items may be renewed one time.
2. Fines are not levied by the Library as a means of generating income, but in order to ensure that books are returned quickly and remain in circulation for as many users as possible.
3. Books are due two weeks from the day they are borrowed. Patrons can access their circulation account from the Library's web site using the patron's library card and library pin number (obtained from the Librarian).
4. Items more than 6 months overdue will be assumed lost and the borrower billed for the retail cost of the item. In situations where it is clear that the overdue item is in high demand or will not be returned, such billing may occur prior to the normal 6-month deadline.
5. Fees may be charged, at the discretion of the Director, for services which incur additional cost to the Library with each use, and services for which funding is not otherwise available.

D. Computer Use

1. The Keene Valley Library is committed to making technology available to its patrons. Computers have become essential tools for research and communication in an increasingly technological world. To this end we will maintain an unsecured wireless network and public unfiltered computers with internet access and a printer for patrons. Access to the Library's wireless network is password protected. The required password is available at the Library desk. Though the KVLA pays for Internet usage, the availability of the computers and wireless access is free to patrons. To cover the costs of these services, the Library gratefully accepts donations.
2. The standard limitations of an unsecured network apply. The wireless network and the public computers are not confidential. Staff will answer any questions or offer assistance to the best of our limited ability if time permits. We thank you for your considerate use of the library and its resources. No guarantee can be made that a wireless connection can be made.
3. Individual use of the public computers is limited to 30 minutes, which may be extended if no one is waiting to use the computers. All computer sessions, including printing, must be completed 15 minutes before the Library closing time. Patrons using the library computers or personal devices via the wireless network are asked to sign the computer register. By signing the register, it is assumed that the person has agreed to this computer use policy. The Library does not keep a record of individual computer users but does keep an overall record for statistical purposes.
4. The public computers have been installed in the Library for education, research and communication. Games are limited to designated gaming computers and children's access is limited. Food and drink are not permitted in the computer or printer areas.
5. The public access computers are connected to the public printer. To print from a laptop at the library, work may be saved to a memory stick, or to the patron's web account, then retrieved from one of the library's public workstations and sent to the public printer. There is a charge for copies.

Computer Users' Responsibilities

1. Computer users may not tamper with, alter, edit, damage, or remove Library computer hardware, data, or software.
2. Computer users are asked to respectfully share resources. All users in the library share the bandwidth, and large downloads such as videos and images require permission from library staff. If time permits, patron questions will be answered or assistance offered by library staff. Patron use of library resources is at the discretion of the Librarian or Library clerk.

Disclaimer

The KVLA assumes no responsibility for safety or security of equipment. The library is not responsible for personal laptop computers or other wireless device configuration, security, or data files resulting from connection to the library's access. The library cannot be held responsible for the confidentiality of any information (credit card numbers, passwords, etc.) that may be compromised, or for any damage caused to patron's hardware or software due to electrical surges, security issues, or consequences caused by viruses or hacking.

E. Collection Development

*The KVLVA supports the American Library Association's **Bill of Rights**, the **Freedom to Read** statement, and the statement **Access to Library Resources and Services for Minors**, which are available in the Appendix to the Policy Manual or at the circulation desk.*

1. The Director is responsible for the selection of materials, taking into consideration requests by patrons. Selection of Library materials shall conform to the Library's goals of serving the educational, informational and recreational needs of its patrons and abiding by the guidelines of the American Library Association. The library director maintains the collection, accessioning and deaccessioning materials as necessary and according to this policy.
2. Library materials are chosen to serve the informational, educational, cultural and recreational needs of the entire community. The primary goal is to provide the best possible collection with the financial resources available. The Library strives to create an attractive, up-to-date, balanced collection representing all fields of knowledge and all sides of issues in a neutral, unbiased manner, as budgets, availability of materials and space permit.
3. Library staff selects materials covering a wide range of ideas, issues and lifestyles. Due to this diversity there will always be some materials that appeal or do not appeal to specific individuals. The existence of a particular viewpoint in the collection is an expression of the Library's policy of intellectual freedom, not an endorsement of that particular point of view. The Library encourages free expression and free access to ideas.
4. "No person or group should dictate what materials are suitable for others in the Library."
(Handbook for Library Trustees of New York State, 2023)
5. Unnecessary duplication is to be avoided where seldom needed information is available to the public in other area libraries. Materials available through inter-library loans and the Clinton, Essex, Franklin Library system shall be made available to borrowers.

Patron Input in Selection of Materials

1. Patrons may submit a request for a specific book or subject at any time orally, electronically through the website, or in writing. The criteria for adding items to the collection will be the same as above. The patron's interest in the material, and its relevance to the patron's needs will be given weight in the decision to acquire the material.
2. Patrons may submit a request for a specific book or subject to be removed by filling out the form "Request for Reconsideration of Material" available at the circulation desk. The patron making the request must already have a CEF Library System card. The request will be reviewed within 30 days by a KVLVA board-appointed committee in consultation with the Director. Their decision is final.

Collection Maintenance

1. To ensure that library collections provide current and relevant material to the public, outdated materials no longer of interest, and damaged materials, whose physical condition makes them unsuitable for circulation, will be removed from the collection. Consideration in these evaluations shall be given to new knowledge, changing social values, technical advances and cultural differences.

2. Materials that have been deaccessioned or lost may be replaced with new editions of classic titles on a continuing basis, based upon budgetary constraints and subject needs. The Library does not automatically replace items withdrawn because of loss, damage or wear. The library standards that apply to accessioning also apply to replacement decisions.

F. Cooperation with Other Libraries

1. The Board and the Library Director shall cooperate with other libraries when such cooperation will bring about expansion of library service or improvement in service.
2. Reciprocal borrowing with other libraries is encouraged, but patrons of the Keene Valley Library have priority in the use of materials.

G. Patron Privacy

1. The sole purpose of Library service records is the maintenance and conservation of library property. They are not to be used to investigate the reading or borrowing habits of individual library patrons.
2. The staff shall not reveal to a third party the nature or purpose of information requested by any patron, or the history of any Internet use generated by a patron, except in circumstances described in the paragraph below:
3. The Director when ordered by a Court of competent jurisdiction may authorize such revelation. The President and the Board shall be kept informed of any action taken in response to the order.
4. The Keene Valley Library Association adheres strictly to all sections of the statute regarding the protection of the confidentiality of its users.

H. The Relationship with Keene Central School

1. At the Keene Valley Library Association (KVLA) Board's discretion, the Keene Central School (KCS) will be permitted to use the library during hours agreed upon in advance. Normally the KCS hours agreement will be reached in the spring for the next school year.
2. KCS classes wishing to use the library during hours it is closed to the public and not covered by that year's KCS hours agreement may do so if the Director is available and agrees to function as Librarian for these class visits.
3. Partnership between KVLA and KCS regarding library use will be managed by the Director.

I. Use of Library Facilities by Other Organizations

1. The Keene Valley Library's facilities are available to members of the Library community. The Board intends that the Library be open for nonprofit educational, cultural and informative community meetings and programs. The Library Board may decline an application. The Director, a Board member, or a Library staff member may be present during use of the Library by an outside organization.
2. No admission may be charged.

3. Nothing may be sold in the Library, other than (a) books and other items sold as part of a Library fund raiser, all of the proceeds of which go to the Library; and (b) books or recordings sold by a presenting author, musician or musical group.
4. Allowing use of the Library does not imply that the Library endorses the user's policies or beliefs. The KVLA supports the American Library Association's guidance on **Meeting Rooms, Exhibit Spaces and Programs** which is available in the appendix to the Policy Manual or at the circulation desk.
5. The group using the facilities is responsible for moving furniture and is expected to replace moved furniture after the meeting. Food and drink may be served at the discretion of the Director or Board President.
6. When a meeting is postponed or canceled, the user group is asked to notify the Director.
7. The Library is not responsible for any equipment, supplies, materials, clothing or other items brought to the Library by any group or individual attending the meeting. The group using the Library at the time the damage occurs must pay for any damage to the premises.
8. The Fire Marshall has prohibited smoking and has posted the maximum capacity of the building, which must not be exceeded.
19. Equipment to be provided by the Library must be requested by the user group in advance, preferably at the time the room is reserved.

Application for Use of the Library Facilities

1. Application for use of Library facilities must be made to the Director in advance of the meeting by means of an application form available at the circulation desk or on-line.
2. Library-sponsored programs will be given first priority, after which other applications will be considered on a first-come, first-served basis by the Director or Board President.
3. The Director is the final authority in granting or denying permission to use the Library facilities.

J. Displays and Handouts

1. Approval of a display or handout material does not constitute endorsement by the Board of any sponsoring cause or activity.
2. Staff displays are displays created by library employees and volunteers. They may incorporate library materials to encourage library use. Displays dealing with controversial subjects should represent a variety of viewpoints.
3. Requests from the public for use of library display space may be granted for educational, cultural or scientific displays designed to promote interest in the use of library materials and services. Public displays may not include prices of displayed material but may include names, addresses and telephone numbers.

4. The Library may, at the Director's discretion, act as a distribution point for handout materials and announcements dealing with subjects of interest to the community. These materials may represent diverse points of view.
5. The library may provide display space for announcements sponsored by civic, political, cultural, educational and religious groups.

K. Soliciting and Selling

Soliciting on Library property will not be permitted except when pertaining to Library business.

II. THE LIBRARY DIRECTOR

The Director (hereinafter "Director") of the Keene Valley Library shall be selected and appointed by the Board of Trustees of the Keene Valley Library Association (hereinafter "Board") and shall hold office at the pleasure of the Board. Compensation is to be reviewed on an annual basis.

A. Duties and Responsibilities

1. The Director shall plan, organize and direct the Library in accordance with Board policies, the By-laws, and New York State laws, regulations and procedures. The Director shall implement Board policies and establish administrative policies to provide a balanced and effective library service with efficient use of resources. The Director shall be present at monthly board meetings and prepare and present quarterly library reports.
2. The Director is to keep the Board fully informed of any issues which might impact on the running of the Library or its place in the community. The Director is responsible for the overall appearance of the Library and shall notify the Executive Committee of any areas in need of repair or renovation.
3. The director will recommend changes in or additions to library policies as needed.

B. Authority and Accountability

1. The Director shall have authority to select, appoint and remove all other staff, in accordance with applicable state regulations and procedures and shall be guided by the recommended standards of the American Library Association. All actions shall be reported to the Board in a timely fashion.
2. The Director shall ensure personnel management practices that are in accordance with Federal, State and County laws and regulations concerning equal employment opportunity and affirmative action.

C. Financial Management

1. The Director is responsible for the deployment of budgeted funds in the management of the library. Requests from staff or from the various programs maintained by the KVLA must be discussed with the Director and require the Director's approval.
2. The Director shall keep the Board informed of availability of private, federal and state funds which could enhance the effectiveness of the Library and of any planned grant applications.

3. Where deemed appropriate by the Director and in consultation with the Library's Treasurer, financial reports for designated line items will be prepared by the Director and submitted at the monthly meeting of the Executive Committee. Financing for any library projects must be approved by the Director in consultation with the Treasurer.

D. Collection Development

The Director shall have the responsibility for collection development for all materials in the library; this includes selection, ordering, processing, culling, and inventory of the collections according to the guidelines in the policy.

E. Library Records

The Director shall initiate, maintain, and organize library records and reports needed for administrative purposes and adequate to furnish basic information to the Library Board, the Clinton, Essex, Franklin Library System and the State of New York. The Director will prepare the annual report, and, in consultation with the Treasurer, will prepare the annual financial report to the Clinton/Essex/Franklin Library System.

III. KEENE VALLEY LIBRARY ASSOCIATION BOARD

KVLA will ensure that board members understand and enforce the policies in this manual. These policies will be reviewed and updated every five years; this manual, approved in 2024, must be reviewed and approved in 2029.

RESOURCES

A. Alpine Room

1. The purpose of the Alpine Room is to collect and maintain books, periodicals and maps pertaining to mountaineering in the Adirondacks and worldwide.
2. Most, but not all, of the materials in this collection circulate.

B. The Archives

1. The KVLA Board shall maintain an Archive, under the direction of a paid Archivist, who shall report to the Library Director. The mission of the Archives shall be to collect, catalog and preserve material related to the history of the Town of Keene and make this material available to the public. Books, manuscripts, photographs, slides, tapes and other historical material concerning the Town of Keene shall be collected and preserved. The Archive will also accept books on the broader subject of the Adirondacks, especially to fill out the Adirondack Bibliography at the discretion of the archivist
2. The Archivist shall be responsible for planning, operating and maintaining the Archive.
3. The Archivist is responsible for the security of the material in the Archive, and for regulations governing the use of archival material. Such regulations shall require visiting researchers to sign a register stating their name, address and field of interest.

4. Archival material may not circulate but will be available for research on the premises. Items may be loaned at the discretion of the archivist.
5. The Archive contains the records of the Library, the Adirondack Mountain Reserve, the Keene Valley Country Club and the Keene Valley Garden Club, and the former Keene Methodist Church, and provides winter storage for the logs of Putnam Camp. Responsibility for maintenance of these records rests with these organizations.

C. Adirondack Community (MyAdirondackStory.org)

1. Sponsored by the Keene Valley Library Association, Adirondack Community is a multi-year on-going local history project that collects and organizes audio stories and related photographs from Town of Keene community members. Through the online platform www.myadirondackstory.org these stories communicate the rich social and cultural history of New York State's Adirondack Mountains.
2. All funds, property, intellectual property and obligations related to Adirondack Community remain within the ownership of the KVLA.
3. The website and activities of Adirondack Community are managed by volunteers and staff under the leadership of the Library Director and in cooperation with the Archivist when appropriate.

D. Art Policy

The Art Committee has responsibility for all art in the main library with the exception of educational displays or archival material. The Library Director has discretion over artifacts and hangings in the Children's Room. Donations of works of art may be accepted with the understanding that they may be sold or added to the collection at the discretion of the Art Committee following consultation if needed.

POLICIES FOR TRUSTEES

The Keene Valley Library is an Association, and as such, is dependent on the Trustees to ensure that the organization does the best work possible in pursuit of all its goals. Our Board of Trustees is a "working" board. In addition to attending and participating in board meetings, each trustee is expected to serve on one or more of the committees that have been established to make our library run efficiently.

A. TRUSTEE RESPONSIBILITIES

1. As Trustees, we understand that our responsibilities include being familiar with and understanding our budget. Budgets are critical and set the stage for the Board's annual work plan.
2. The Board shall select and appoint the Library Director and support the Director in the work of the library.

3. Trustees will develop a good working knowledge of all policies and programs that are approved by the Board and will assist in the implementation of policies and programs. Trustees will keep up-to-date on the library business. As of January 1, 2023, New York State requires library trustees to have at least two hours of continuing education training every calendar year. This is in addition to the required Sexual Harassment training. According to the New York State Library “Public library trustees in New York State oversee an estimated \$1.6 billion of the public’s money—a responsibility that must be undertaken by informed, thoughtful, prudent, and trustworthy library boards.”

4. Trustees will interpret the library’s work and benefits to our community and serve as the library’s spokesperson.

5. Trustees will attend the Quarterly and the Annual Board Meetings and selected committee meetings. If unable to attend, Trustees may be available for phone consultation and/or Zoom virtual attendance.

6. Trustees will provide annual financial support for the library to the extent it is personally feasible. Having all board members contribute is an asset when approaching the community or grant sources for financial assistance.

7. The entire Board of Trustees will work to create a team effort to accomplish the business of the Keene Valley Library Association. Trustees will identify and recruit potential KVLA Trustees and committee members.

**B. KEENE VALLEY LIBRARY ASSOCIATION
INVESTMENT POLICY**

(June 13, 2011 – revised February 2024)

Statement: This statement of investment policy is issued by the Investment Committee of the Board of Trustees (the “Board”) of the Keene Valley Library Association (“KVL”) for guidance in the allocation of its investment funds.

A. The financial resources of the Library exist to:

1. Provide funds to support the operating needs of the Library including property maintenance and general management expenses;
2. Meet unforeseen emergencies;
3. Provide stability for shortfalls in projected revenue and/or higher than expected short-term expenses;
4. Finance small capital expenditures.

B. Investment Considerations and Objectives:

1. In managing KVL’s investment funds, the following factors, if relevant, shall be considered: (a) general economic conditions, (b) the possible effect of inflation or deflation, (c) the expected tax consequences, if any, of investment decisions or strategies, (d) the role that each investment or course of action plays within the overall investment portfolio of the fund, (e) the expected total return from income and the appreciation of investments, (f) other resources of KVL, (g) the needs of KVL and the fund to make distributions and to preserve capital, and (h) an asset’s special value, if any, to the purposes of KVL;
2. The invested funds will seek to achieve capital appreciation as well as reasonable income consistent with the preservation and safety of principal;
3. Investments shall consist of mutual funds, exchange traded funds, common stock, preferred stock, convertible issues and bonds carrying an investment grade of “BBB” or better, cash and money market funds;
4. Management and investment decisions about an individual asset shall not be made in isolation but rather in the context of the fund’s investment portfolio as a whole and as part of a suitable overall investment strategy;
5. The Investment Committee is guided by the objective to provide operating funds equaling 5 percent of the rolling average of the year end fund balances over the previous three year period;
6. The primary long-term investment objective is to preserve and enhance the purchasing power of the funds while allowing them to support a sustainable and relatively predictable level of spending;
7. The Investment Committee expects the Board to anticipate significant capital expenditures; to give ample notice of portfolio withdrawals; and to understand that principal drawdowns may be necessary for core and small capital expenditures;
8. The Investment Committee reserves the flexibility in times of extreme market volatility or investment underperformance to recommend a more sustainable spending policy to the Board;

9. If the Investment Committee finds that the objectives and policies set forth in this Investment Policy Statement inhibit investment performance, the Committee will communicate this view to the Board.

C. Duties of the Investment Committee:

The principal duties of the Investment Committee shall consist of (a) making recommendations to the Board regarding the selection, continuation or termination of an independent investment advisor(s) to whom the management of the investment funds will be delegated, which shall include an assessment of the independence of the investment advisor(s), including any conflicts of interest an investment advisor has or may have ; (b) making recommendations to the Board regarding the scope and terms of the delegation to the investment advisor(s) and the compensation to be paid, consistent with the purposes of KVLA and the fund; (c) monitoring the performance of the investment advisor(s) and the compliance by the investment advisor(s) with the scope and terms of the delegation; and (d) otherwise implementing the policies outlined in this Investment Policy Statement. In performing these duties, the Investment Committee shall act in good faith, with the care that an ordinarily prudent person in a like position would exercise under similar circumstances as required by section 717 of the Not-for-Profit Corporation Law.

D. Diversification; Asset Allocation:

The investment funds of KVLA shall be diversified, with no holding in any single security (other than mutual funds, U.S. government bonds, and insured deposit accounts and certificates of deposit) being (i) more than 5% of KVLA's total portfolio when such security is initially purchased or (ii) more than 10% of the total portfolio at any time thereafter. To achieve KVLA's investment and income objectives, the Investment Committee has established the following asset allocation targets;

Asset Class %Target Allocation

Cash and cash equivalents 5%-10%

Fixed Income 25%- 45%

Equities (domestic & global) 45%-70%

The investment advisor(s) will rebalance the funds to within the target allocation twice each year (on or about January 15th and July 15th).

E. Delegation of Investment Management:

Decisions regarding the makeup of the investment portfolio (including, without limitation, individual security selection, security size and quality, number of holdings, current income levels and turnover) shall be delegated to the investment funds' independent investment advisor(s). Each contract pursuant to which investment authority is delegated to an independent investment advisor shall provide that it can be terminated by the Board at any time, without penalty, upon not more than 60 days notice.

F. Investment Gift Policy: At the discretion of the Investment Committee, gifts of securities may be held in-kind or liquidated to augment the existing portfolio. Within a reasonable time after receipt of a gift of securities, the Investment Committee shall, in consultation with the independent investment advisor(s), make and carry out decisions concerning the retention or disposition of the gifted property or to rebalance KVLA's investment funds, as required by section 552(e)(5) of the Not-for-Profit Corporation Law. A donor shall notify the Investment Committee Chairperson or the President of KVLA of his or her desire to make a donation of securities to KVLA. Transfer instructions shall be provided to the donor or the donor's broker and a letter of appreciation shall be sent promptly on behalf of the Board.

**C. KEENE VALLEY LIBRARY ASSOCIATION
CONFLICT OF INTEREST POLICY
(Revised February 2024)**

Article I - Purpose

The purpose of the conflict of interest policy is to protect this tax-exempt Organization's interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director or trustee of the Organization or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Article II - Definitions

1. Interested Person Any trustee, director, principal officer, or member of a committee with governing board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

2. Financial Interest A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which the Organization has a transaction or arrangement,
- b. A compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangement, or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement.
- d. Compensation includes direct and indirect remuneration as well as gifts or favors that aren't insubstantial. A financial interest isn't necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

3. Independent Trustee A trustee shall be considered "independent" for purposes of this policy if the trustee is "independent" as defined in the instructions for IRS Form 990.

Article III - Procedures

1. Duty to Disclose In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the trustees or directors and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

2. Determining Whether a Conflict of Interest Exists After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the governing board or committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

3. Procedures for Addressing the Conflict of Interest

- a. An interested person may make a presentation at the governing board or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest. An interested person is prohibited from any attempt to influence improperly the deliberation or voting on the matter giving rise to such conflict.
- b. The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.

c. After exercising due diligence, the governing board or committee shall determine whether the Organization can obtain, with reasonable efforts, a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.

d. If a more advantageous transaction or arrangement isn't reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a majority vote of the disinterested trustees or directors whether the transaction or arrangement is in the Organization best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

4. Violations of the Conflict of Interest Policy

a. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.

b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Article IV - Records of Proceedings

The minutes of the governing board and all committees with board delegated powers shall contain:

a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the governing board's or committee's decision as to whether a conflict of interest in fact existed.

b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

Article V - Compensation

a. A voting member of the governing board who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.

b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization for services is precluded from voting on matters pertaining to that member's compensation.

c. No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Organization, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

Article VI – First and Annual Statements

Each trustee, director, principal officer, and member of a committee with governing board delegated powers shall prior to their election and annually thereafter sign and submit to the Secretary a statement which affirms such person:

a. has received, read, understands, and agrees to comply with the conflict of interest policy,

b. has identified to the best of their knowledge 1) any entity in which such person has a financial interest or managerial role and which has a relationship with the Organization or 2) any transaction in which the Organization is a participant and in which such person might have a conflicting interest.

- c. understands the Organization is charitable and in order to maintain its federal tax exemption it must engage primarily in activities that accomplish one or more of its tax-exempt purposes and
- d. is an independent trustee or director of the Organization.

If, at any time during the year, the information in the annual statement previously signed by a trustee, office or committee member changes materially, such trustee, office or committee member shall disclose such changes in a revised annual statement.

Periodic Reviews

To ensure the Organization operates in a manner consistent with charitable purposes, and doesn't engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- a. Whether compensation arrangements and benefits are reasonable, based on competent survey information, and the result of arm's length bargaining.
- b. Whether partnerships, joint ventures, and arrangements with management organizations conform to the Organization's written policies, are properly recorded, reflect reasonable investment or payments for goods and services, further charitable purposes and don't result in inurement, impermissible private benefit, or in an excess benefit transaction.

Article VIII - Use of Outside Experts

When conducting the periodic reviews, as provided for in Article VII, the Organization may, but need not, use outside advisors. If outside experts are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews are conducted.

SOURCES

Appendix A IRS Sample Conflicts of Interest Policy

<https://www.irs.gov/instructions/i1023#idm139883040005664>

NYS Not-for-Profit Law, NPC/Article 7/715-A

<http://public.leginfo.state.ny.us/lawssrch.cgi?NVLWO:>

**D. KEENE VALLEY LIBRARY ASSOCIATION
ANTI-DISCRIMINATION POLICY**
including Gender Identity Non-Discrimination
(Adopted December 13, 2021, revised February, 2024)

Introduction

The Keene Valley Library is committed to maintaining an environment that is comfortable and welcoming to all, and that is free of all forms of discrimination and harassment, including sexual harassment, in accordance with the New York State Human Rights Law. In keeping with this commitment, the Library will not tolerate discrimination or harassment by anyone, including any staff member, patron, trustee, or contractor.

Discrimination consists of actions taken against an individual based on an actual or perceived characteristic protected by law, such as sex, race, color, ancestry, national origin, citizenship status, religion, age, disability, marital status, sexual orientation, gender identity, pregnancy, military or veteran status, genetic information, order of protection status, or any other category protected by applicable law. In other words, discrimination occurs when an individual is treated differently or unequally because the individual is a member or perceived member of a protected group.

Violation of this policy shall be grounds for disciplinary action up to and including termination of employment, dismissal from the board and/or exclusion from use of library services. It is not a defense that a discriminatory action was taken because of the personal religious beliefs of an employer, employee, patron, board member, place of public accommodation, housing provider or other covered entity.

Gender Identity Non-Discrimination

In 2019, the Human Rights Law was amended through the Gender Expression Non-Discrimination Act (GENDA) to explicitly add gender identity or expression as a protected category. Discrimination on the basis of gender identity or expression is prohibited in all areas covered by the Human Rights Law.

Unlawful discrimination based on gender identity or expression can include:

- Not using requested pronouns and names. Requested pronouns are legally-protected rights in all areas of jurisdiction, including employment, places of public accommodation, public and private housing, educational institutions and credit.
- Revealing a person's transgender or gender non-conforming status without their consent
- Questions about gender identity or expression, or assigned sex at birth, such as in a job interview;
- Denying the use of restrooms or other facilities consistent with a person's gender identity;
- Asking a transgender person to use a single-occupancy restroom because of someone else's concerns;
- Requiring individuals to show medical or other documents in order to use facilities, such as restrooms, locker rooms or residential facilities, consistent with their gender identity;
- Utilizing grooming, uniform or appearance standards based on sex stereotypes

Complainants may use the process outlined in the KVLA Sexual Harassment Policy and the KVLA Sexual Harassment Complaint Form available at the circulation desk.

**E. KEENE VALLEY LIBRARY ASSOCIATION
SEXUAL HARASSMENT POLICY**
(Adopted December 13, 2021, revised February, 2024)

Introduction

Keene Valley Library is committed to maintaining a workplace free from sexual harassment. Sexual harassment is a form of workplace discrimination. All employees are required to work in a manner that prevents sexual harassment in the workplace. This Policy is one component of Keene Valley Library's commitment to a discrimination-free work environment. Sexual harassment is against the law and all employees have a legal right to a workplace free from sexual harassment and employees are urged to report sexual harassment by filing a complaint internally with Keene Valley Library. Employees can also file a complaint with a government agency or in court under federal, state or local anti-discrimination laws.

While this policy specifically addresses sexual harassment, harassment because of and discrimination against persons of all protected classes is prohibited. In New York State, such classes include age, race, creed, color, national origin, sexual orientation, military status, sex, disability, marital status, domestic violence victim status, gender identity or expression, familial status, predisposing genetic characteristics, and criminal history.

Library Employee/Patron Relationship

Keene Valley Library is committed to ensuring an environment where all library patrons are free of sexual harassment. The Board views sexual harassment of patrons by library employees as an abuse of authority and, therefore, such harassment will not be tolerated. Likewise, sexual harassment of library employees by patrons will not be tolerated. See examples of sexual harassment below.

Any patron who suspects that she or he has encountered sexual harassment should report the incident to the Library Director as soon as possible. Any employee who witnesses or has knowledge of sexual harassment by a library employee against a patron shall immediately report it to the Library Director. Any employee who is being sexually harassed by a patron shall immediately report this to the Library Director.

I. Policy

1. Keene Valley Library's policy applies to all employees, applicants for employment, interns, whether paid or unpaid, contractors, library patrons, and persons conducting business, regardless of immigration status, with Keene Valley Library. In the remainder of this document, the term "employees" refers to this collective group.
2. Sexual harassment will not be tolerated. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to remedial and/or disciplinary action (e.g., counseling, suspension, termination).
3. Retaliation Prohibition: No person covered by this Policy shall be subject to adverse action because the employee reports an incident of sexual harassment, provides information, or otherwise assists in any investigation of a sexual harassment complaint. Keene Valley Library will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of Keene Valley Library who retaliates against anyone involved in a sexual harassment investigation will be subjected to disciplinary action, up to and including termination. All employees, paid or unpaid interns, or non-employees working in the workplace who believe they have been subject to such retaliation should inform a supervisor, manager, or board president. All employees, paid or unpaid interns or non-employees who believe they have been a target of such retaliation may also seek relief in other available forums, as explained below in the section on Legal Protections.

4. Sexual harassment is offensive, is a violation of our policies, is unlawful, and may subject Keene Valley Library to liability for harm to targets of sexual harassment. Harassers may also be individually subject to liability. Employees of every level who engage in sexual harassment, including managers and supervisors who engage in sexual harassment or who allow such behavior to continue, will be penalized for such misconduct.

5. Keene Valley Library will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about sexual harassment, or otherwise knows of possible sexual harassment occurring. Keene Valley Library will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.

6. All employees are encouraged to report any harassment or behaviors that violate this policy. The Keene Valley Library director will provide all employees a complaint form for employees to report harassment and file complaints.

7. Managers and supervisors are **required** to report any complaint that they receive, or any harassment that they observe or become aware of, to the Library Director.

8. This policy applies to all employees, paid or unpaid interns, and non-employees, such as contractors, subcontractors, vendors, consultants or anyone providing services in the workplace, and all must follow and uphold this policy. Protected non-employees include persons commonly referred to as independent contractors, “gig” workers and temporary workers. Also included are persons providing equipment repair, cleaning services or any other services provided pursuant to a contract with the employer. This policy must be provided to all employees and should be posted prominently to the extent practicable and be provided to employees upon hiring.

II. What Is “Sexual Harassment”?

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender. Sexual harassment is unlawful when it subjects an individual to inferior terms, conditions, or privileges of employment. Harassment need not be severe or pervasive to be unlawful, and can be any harassing conduct that consists of more than petty slights or trivial inconveniences. Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual’s sex when:

- Such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual’s employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual’s sex. Sexual harassment also consists of

any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.

Any employee who feels harassed should report so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

III. Examples of Sexual Harassment

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
 - o Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body;
 - o Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
 - o Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
 - o Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
 - o Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
 - o Sabotaging an individual's work;
 - o Bullying, yelling, name-calling.

IV. Who can be a target of sexual harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. New York Law protects employees, paid or unpaid interns, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the workplace. Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

V. Retaliation

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a sexual harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours). Such retaliation is unlawful under federal, state, and (where applicable) local law. The New York State Human Rights Law protects any individual who has engaged in “protected activity.” Protected activity occurs when a person has:

- made a complaint of sexual harassment, either internally or with any anti-discrimination agency;
- testified or assisted in a proceeding involving sexual harassment under the Human Rights Law or other anti-discrimination law;
- opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;
- reported that another employee has been sexually harassed; or
- encouraged a fellow employee to report harassment.

Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

VI. Reporting Sexual Harassment

Preventing sexual harassment is everyone’s responsibility. Keene Valley Library cannot prevent or remedy sexual harassment unless it knows about it. Any employee, paid or unpaid intern or non-employee who has been subjected to behavior that may constitute sexual harassment is encouraged to report such behavior to the Library Director or Board President. Anyone who witnesses or becomes aware of potential instances of sexual harassment should report such behavior to the Library Director or Board President.

Reports of sexual harassment may be made verbally or in writing. **The KVLA Sexual Harassment Complaint Form is available at the circulation desk**, and all employees are encouraged to use this complaint form. Employees who are reporting sexual harassment on behalf of other employees should use the complaint form and note that it is on another employee’s behalf.

Employees, paid or unpaid interns or non-employees who believe they have been a target of sexual harassment may also seek assistance in other available forums, as explained below in the section on Legal Protections.

VII. Supervisory Responsibilities

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, **are required** to report such suspected sexual harassment to the KVLA Board President.

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.

Supervisors and managers will also be subject to discipline for engaging in any retaliation.

VIII. Annual Sexual Harassment Training

Keene Valley Library, in accordance with New York State Law, provides all employees, regular volunteers, and trustees with annual sexual harassment training.

IX. Complaint and Investigation of Sexual Harassment

All complaints or information about sexual harassment will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner, and will be confidential to the extent possible.

An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough, commenced immediately and completed as soon as possible. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

Any employee may be required to cooperate as needed in an investigation of suspected sexual harassment. Keene Valley Library will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations should be done in accordance with the following steps:

- Upon receipt of complaint, the Library Director will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the respondent to refrain from communications with the complainant), as appropriate. If complaint is verbal, encourage the individual to complete the Complaint Form in writing. If he or she refuses, prepare a Complaint Form based on the verbal reporting.
- If documents, emails or phone records are relevant to the investigation, take steps to obtain and preserve them.
- Request and review all relevant documents, including all electronic communications.
- Interview all parties involved, including any relevant witnesses;
- Create a written documentation of the investigation (such as a letter, memo or email), which contains the following:
 - o A list of all documents reviewed, along with a detailed summary of relevant documents;
 - o A list of names of those interviewed, along with a detailed summary of their statements;
 - o A timeline of events;
 - o A summary of prior relevant incidents, reported or unreported; and
 - o The basis for the decision and final resolution of the complaint, together with any corrective action(s).
- Keep the written documentation and associated documents in a secure and confidential location.
- Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document.
- Inform the individual who reported of the right to file a complaint or charge externally as outlined in the next section.

X. Legal Protections And External Remedies

Sexual harassment is not only prohibited by Keene Valley Library but is also prohibited by state, federal, and, where applicable, local law. Aside from the internal process at Keene Valley Library, employees may also choose to pursue legal remedies with the following governmental entities. While a private attorney is not required to file a complaint with a governmental agency, you may seek the legal advice of an attorney.

State Human Rights Law (HRL)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court.

Complaints with DHR may be filed any time within three years of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, within three years of the alleged sexual harassment. An individual may not file with DHR if they have already filed a HRL complaint in state court.

Complaining internally to Keene Valley Library does not extend your time to file with DHR or in court.

The one year or three years is counted from date of the most recent incident of harassment. You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: www.dhr.ny.gov. Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have

at least 15 employees to come within the jurisdiction of the EEOC. An employee alleging discrimination at work can file a “Charge of Discrimination.” The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.

If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists.

F. KEENE VALLEY LIBRARY ASSOCIATION WHISTLE BLOWER POLICY (adopted March, 2024)

KVLA is committed to operating in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees, or volunteers. This policy outlines a procedure for employees to report actions that an employee reasonably believes violates a law, or regulation or that constitutes fraudulent accounting or other practices. This policy applies to any matter which is related to KVLA business and does not relate to private acts of an individual not connected to the business of the KVLA.

If an employee has a reasonable belief that an employee or KVLA has engaged in any action that violates any applicable law, or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, the employee is expected to immediately report such information to the Library Director. If the employee does not feel comfortable reporting the information to the Library Director, he or she is expected to report the information to the President of the KVLA Board.

All reports will be followed up promptly, and an investigation conducted. In conducting its investigations, KVLA will strive to keep the identity of the complaining individual as confidential as possible, while conducting an adequate review and investigation.

KVLA will not retaliate against an employee in the terms and conditions of employment because that employee: (a) reports to a supervisor, to the Library Director, the Board of Directors or to a federal, state or local agency what the employee believes in good faith to be a violation of the law; or (b) participates in good faith in any resulting investigation or proceeding, or (c) exercises his or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee’s rights.

KVLA may take disciplinary action (up to and including termination) against an employee who in management’s assessment has engaged in retaliatory conduct in violation of this policy.

In addition, KVLA will not, with the intent to retaliate, take any action harmful to any employee who has provided to law enforcement personnel or a court truthful information relating to the commission or possible commission by KVLA or any of its employees of a violation of any applicable law or regulation.

Supervisors will be trained on this policy and KVLA’s prohibition against retaliation in accordance with this policy.

APPENDIX

AMERICAN LIBRARY ASSOCIATION STATEMENTS

- p. 28 The Library Bill of Rights

- p. 29 The Freedom to Read Statement

- p. 30 Access to Library Resources and Services for Minors

- p. 32 Meeting Rooms, Exhibit Spaces, and Programs