

## **Board of Director's Policy Governance 200 Series**

**Policy # 200.11.20**

### **Whistle Blower Policy**

Prairie Crossing Charter School (the "School") expects its 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 School, such directors, officers and employees must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable laws and regulations and all policies of the School (collectively, the "School Policies").

Wrongful Conduct, as defined in this Whistleblower Policy, of any kind is prohibited.

#### **Reporting Responsibility**

It is the responsibility of all directors, officers and employees to comply with the School Policies and to report Wrongful Conduct (or suspected Wrongful Conduct) to an appropriate representative of the School in accordance with this Whistleblower Policy.

"Wrongful Conduct" is any activity in violation of any state, federal, or local law or regulation or any School Policy undertaken by a director, officer or employee in the performance of such individual's official duties, whether or not such activity is within the scope of his or her intended responsibilities on behalf of the School. This includes, but is not limited to, corruption, malfeasance, bribery, theft, fraud, coercion, conversion, malicious prosecution, harassment, or misuse of the School's property and facilities.

#### **No Retaliation**

No director, officer or employee who in good faith reports Wrongful Conduct in accordance with this Whistleblower Policy shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported Wrongful Conduct in good faith is subject to discipline up to and including termination of employment. A director or officer who retaliates against someone who has reported Wrongful Conduct in good faith is subject to removal from service as a director or officer. This Whistleblower Policy is intended to encourage and enable directors, officers, employees and others to raise serious concerns with the School.

Directors, officers and employees are also protected against retaliation for providing information to, or otherwise assisting in an investigation by, a regulatory authority or law enforcement agency, any member of Congress or committee of Congress, or any person with supervisory authority over an employee or who has authority to investigate, discover or terminate Wrongful Conduct where such information or investigation relates to any conduct of the School that the reporting individual believes constitutes Wrongful Conduct within the meaning of this Whistleblower Policy. Any director, officer or employee who files, testifies, participates in, or otherwise assists in a proceeding relating to alleged Wrongful Conduct is also protected against retaliation. Acts of retaliation by a director, officer or employee are prohibited.

#### **Reporting Violations**

School practices suggest that employees 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 the ~~School-Executive~~ Director. Supervisors are required to report suspected Wrongful Conduct to the ~~School's-Executive~~ Director, who has specific and exclusive responsibility to investigate all reported Wrongful Conduct. For suspected fraud, or when you are not satisfied or uncomfortable with following the School's open door practice, individuals should contact the ~~School's Executive~~ Director directly unless the wrongful conduct is suspected of the ~~School's Executive~~ Director and then in such case the report should be made directly to the President of the Board of Directors.

### **Compliance Officer**

The ~~School's-Executive~~ Director and/~~or their designee-Principal~~ are responsible for investigating and resolving all reported complaints and allegations concerning Wrongful Conduct and, at the discretion of the ~~School-Executive~~ Director, shall advise the President of the Board of Directors. The ~~School's-Executive~~ Director and/~~or their designee Principal~~ have direct access to ~~me-the~~ Board of Directors in relation to matters of Wrongful Conduct and are required to report to the Board of Directors at least annually on compliance activity.

### **Accounting and Auditing Matters**

The Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The ~~School-Executive~~ Director shall immediately notify the Board of Directors of any such complaint and work with the Board of Directors until the matter is resolved.

### **Acting in Good Faith**

Anyone filing a complaint concerning a serious violation or suspected violation law or other Wrongful Conduct must be acting in good faith and have reasonable cause for believing the information disclosed indicates a violation of law or other Wrongful Conduct. 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**

Reports of Wrongful Conduct may be submitted on a confidential basis by the complainant or may be submitted anonymously. Such reports will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

### **Handling of Reported Wrongful Conduct**

The ~~School-Executive~~ Director and/~~or their designee~~ will notify the individual who has made a report under this Whistleblower Policy of the School's receipt of the reported Wrongful Conduct within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

## **Adoption Dates:**

Adopted March 24, 2009