



## SECTION IV: Employee POLICY 4050

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### Whistleblower Policy

The Board of Education (“Board”) of Insight School of Oklahoma (the “School”) wants to encourage staff and others to come forward with credible information should there be any questionable practices or violations of policies of the School. The Board expresses its belief that School has moral, ethical and legal responsibilities for the stewardship of its resources and the public and private support that enables it to pursue its mission. Although the Board’s policies and the School’s internal controls and operating procedures are intended to deter, detect, and prevent improper activities, as at any institution, intentional and unintentional violations of laws, administrative rules, regulations, and policies may occur. The Board adopts this policy as it is intended to result in the internal identification and remediation of such violations.

#### **Definition:**

“Protected Disclosure” means an allegation, made in good faith, that the School or one or more of its employees, contractors (acting in the course of its work for the School) or members of the Board, has in the course of his, her or its duties to School has acted unlawfully, has acted in violation of published Board policies, has directly or indirectly used or attempted to use the authority or influence of his or her position to intimidate, harass, or embarrass another person, has used or attempted to use his or her position for their own personal benefit, or has acted in a manner that may be in violation of any laws, rules, and regulations.

#### **Reporting Protected Disclosures:**

Any person may make a Protected Disclosure. It is the responsibility of all employees and members of the Board to report Protected Disclosures. Protected Disclosures should be made in writing so as to assure a clear understanding of the issues but may be made orally. Reports should be factual and contain as much specific information as possible. Protected Disclosures shall be made 1) by employees to their immediate supervisor or other person upwards in the supervisory chain if the immediate supervisor is a part of the Protected Disclosure, and 2) by other persons to the Head of School, or if said Protected Disclosure involves the Head of School, to the Chair of the Board, or the Vice-Chair of the Board should the Protected Disclosure involve the Chair. However, when there is a potential conflict of interest, such reports may be made to another person in management who you may reasonably expect to have either responsibility over the affected area or the authority to review the alleged improper activity on behalf of the School.

#### **Protection from Retaliation:**

School and its employees and Board members are prohibited from 1) retaliating or attempting to retaliate against any person who has made a Protected Disclosure or who has refused to obey a directive that is in contravention of the law, administrative rules, or regulations, or in violation of Board policies, and from 2) directly or indirectly using or attempting to use the authority or influence of his or her position to intimidate, harass, or embarrass another person, for their own personal benefit, or for the purpose of interfering with the right of the person to make a Protected Disclosure. Anyone who retaliates against or interferes with someone who has made a Protected Disclosure is subject to discipline which, for employees, could be up to and including termination; or, for members of the Board could be removal from the Board.

## **Whistleblower Policy (continued)**

### **Investigations:**

Individuals to whom a Protected Disclosure is made are required to report them to the Head of School, and Board Chair within twenty-four (24) hours of receipt of the disclosure unless the disclosure involves one of those individuals. The Head of School or Chair of the Board will undertake or cause to be undertaken an investigation of the alleged violations and will involve those individuals deemed necessary to the investigation. The Head of School will immediately advise the Board chair of all Protected Disclosures regarding improper use of public funds, financial and accounting practices, internal financial controls, or auditing matters. All internal complaints will be investigated promptly and with discretion, and all information obtained will be handled on a “need to know” basis. At the conclusion of an investigation, as appropriate, remedial and/or disciplinary action will be taken where the allegations are verified and/or otherwise reasonably substantiated. As necessary, any Protected Disclosures that require that such information be reported to another governmental agency shall be timely reported by the Head of School or Board Chair.