



WHISTLEBLOWER POLICY

Reporting Suspected Misconduct, Dishonesty, or Fraud

Robert Frost Public Charter School (RFPCS) strives to uphold the highest possible standards of ethical, moral and legal conduct. The School is committed to maintaining a workplace where employees, officers and trustees are free to raise concerns in good faith regarding our governance practices. Consistent with this commitment, this policy provides an avenue for employees, officers and trustees to report concerns about suspected misconduct, dishonesty, non-compliance with laws, or fraud without fear of retaliation.

This policy is not intended for reporting of day-to-day matters, such as student disciplinary issues, employment issues, general complaints or other matters that are regularly handled through other policies and procedures.

Scope

The reporting procedure outlined in this policy should be used to report suspected misconduct, dishonesty, legal non-compliance, conflict of interest or fraud in the operation of the organization (collectively referred to as "Suspected Violations"), including but not limited to:

- Theft or other misappropriation of RFPCS assets
- Deliberate misstatements, falsification or other irregularities in RFPCS financial reports or records
- Non-compliance with state or federal laws
- Misuse of RFPCS resources
- Illegal activities
- Forgery or alteration of documents
- Violations of state or federal laws
- Any other form of fraud or malfeasance

Procedure

Reporting Suspected Violations: Employees, officers and trustees may report Suspected Violations to the Head of School or to the Chair of the Board of Trustees (the "Chair") verbally or in writing. The Chair's contact information is available on the RFPCS website or the [Chair can be reached via email at this link](#).

Anonymous Reporting: Employees, officers, and trustees are encouraged to disclose their identity when reporting Suspected Violations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. However, anonymous reports of Suspected Violations will be treated in the same manner as any other reports. The employee, officer, or trustee may make the anonymous report to the Head of School or to the Chair verbally or in writing. The Chair's contact information is available on the RFPCS website, or the [Chair can be reached via email at this link](#)

Timing: The earlier a Suspected Violation is reported, the easier it is to take effective action. Employees, officers and trustees are therefore encouraged to make a report as soon as they become aware of a Suspected Violation.

Investigating a Suspected Violation: Once a Suspected Violation is reported to the Head of School or to the Chair, the Head of School and Chair will initially assess the matter and recommend further action to the Board of Trustees, if appropriate, which may include further investigation, corrective action, disciplinary action, reporting the matter to the proper authorities or other appropriate action. The Board of Trustees may enlist Committee members, employees of the school and/or outside legal, accounting or other advisors, as appropriate, to conduct the investigation. Investigations will be handled with sensitivity, discretion and confidentiality to the fullest extent practicable under the circumstances, but complete confidentiality cannot be guaranteed, particularly if it will inhibit a thorough investigation.

If the investigation reveals that wrongdoing has taken place, prompt and effective remedial action will be taken. This may include disciplinary action, termination, legal action or other corrective measures to prevent further violations.

Safeguards

No Retaliation: An employee, officer, or trustee who reports a Suspected Violation in good faith shall not suffer any harassment, retaliation or adverse employment consequences for making the report. Any person who participates in the investigation of a Suspected Violation shall not suffer any harassment, retaliation or adverse employment consequences. Any harassment, retaliation or adverse employment consequences should be reported to the Chair. An employee, officer or trustee who retaliates against a person for reporting a Suspected Violation in good faith or for participating in the investigation of a Suspected Violation shall be subject to disciplinary action, up to and including termination of employment or other authorized sanction. This policy is intended to encourage and enable employees, officers and trustees to report Suspected Violations within the organization prior to seeking resolution outside the organization.

Additionally, no employee, officer or trustee shall be adversely affected because he or she refuses to carry out a directive which, in fact, constitutes misconduct, dishonesty or fraud, or which violates state or federal law.

Acting in Good Faith: Anyone reporting a Suspected Violation should be acting in good faith and have reasonable grounds for believing the information disclosed indicates misconduct, dishonesty, violation of a state or federal law, or fraud. Making allegations that prove not to be substantiated and that were made maliciously or with the knowledge that they were false will be viewed as a serious offense and will lead to disciplinary action up to and including termination.