

## **WHISTLEBLOWER POLICY**

### **General**

All employees of Trinity Christian School are expected to abide by the Code of Conduct exhibiting high standards of Christian ethics in the conduct of their duties and responsibilities. Directors, Administration, faculty and staff must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### **Reporting Responsibility**

It is the responsibility of all School Board members, Administrators, faculty, staff and volunteers to comply with the Code of Conduct and to report violations or suspected violations in accordance with this Whistleblower policy.

### **Protection against Retaliation**

No School Board member, Administrator, faculty, staff or volunteer who in good faith reports a violation of the Code of Conduct shall suffer harassment, retaliation or adverse consequence. A Director, Administrator, faculty, staff or volunteer who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or suspension of duties. This Whistleblower Policy is intended to encourage and enable all members of Trinity Christian School to raise serious concerns within the school context prior to seeking resolution outside the school.

### **Definition and Examples of Violations**

Although the high standards of conduct required within Trinity Christian School may necessitate the reporting of any of a broad array of concerns or violations, fraudulent or dishonest conduct should be defined as a deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Examples of such conduct include, but are not limited to:

- forgery or alteration of documents
- unauthorized alteration or manipulation of computer files
- fraudulent financial reporting
- misappropriation or misuse of Trinity Christian School's resources, such as funds, supplies, or other assets
- authorizing or receiving compensation for goods not received or services not performed;
- authorizing or receiving compensation for hours not worked
- sexual harassment
- conduct which violates Trinity Christian School's policies or procedures
- discrimination on the basis of gender or race

### **Reporting Violations**

Trinity Christian School maintains an "open door policy" where employees are encouraged to share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's supervisor or the Administrator is in the best position to address an area of concern. Supervisors and administrators are required to report suspected violations of the Code of Conduct to the Head Administrator who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when you are not satisfied or uncomfortable with following the school's open door policy, individuals should contact a School Board member directly.

**Acting in Good Faith**

Anyone filing a complaint concerning a violation or suspected violation of the Code must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the Code of Conduct. Any baseless allegations or frivolous complaints 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. The employee must be truthful in reporting and cooperative with investigators.

An employer who discloses information about a former or current employee to a prospective employer of the former or current employee upon request of the prospective employer or of the former employee is immune from civil liability for such disclosure or its consequences unless it is shown by clear and convincing evidence that the information disclosed by the former or current employer was knowingly false or violated any civil right of the former or current employee protected under F.S. Chapter 760. (F.S. 768.095)

**Confidentiality**

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

**Handling of Reported Violations**

The Administrator will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

**Accounting and Auditing Matters**

The Finance Committee of Trinity Baptist Church and Trinity Christian School shall address all reported concerns or complaints regarding accounting practices, internal controls or auditing. The Administrator shall immediately notify the Finance Committee of any such complaint and work with the committee until the matter is resolved.

**Compliance Officer**

In regard to alleged violations of the Code of Conduct, the Administrator acts as the school's Compliance Officer and is responsible for investigation and resolving all reported complaints and allegations. At her discretion, the Administrator will notify the School Board of the alleged violations.

**Trinity Christian School's Employment Practice Liability Insurance is carried through Great American Company. Any claims should be forwarded to Newman Crane & Associates Insurance Company ([newmancraneins.com](http://newmancraneins.com)).**

**I have read the Trinity Christian School Ethics in Education and understand its content.**

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

\_\_\_\_\_  
Name (printed)