

## Whistleblower Policy

St. Louis Public Schools (SLPS) is committed to facilitating open and honest communication relevant to its governance, finances, and compliance with all applicable laws and regulations. SLPS requires all employees and others to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The purpose of this policy is to establish a method of reporting within SLPS in order to minimize the risk of internal and external fraud as well as the theft of SLPS assets or fraudulent financial reporting. Employees and representatives of SLPS must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. This policy reflects the practices and principles of behavior that support this commitment. The policy will also protect a person who witnesses or has evidence of personal appropriation of SLPS resources or violation of SLPS policies, procedures or law. More specifically it:

- Encourages persons to disclose serious breaches of conduct covered by SLPS policies, procedures or law;
- Protects employees from reprisal by adverse employment action as a result of having disclosed wrongful conduct (employees who self report misconduct are not afforded protection by this procedure); and
- Provides individuals, who believe they have been subject to reprisal, a fair process to seek relief from retaliatory acts.

We request the assistance of every employee and representative of SLPS who has a reasonable belief or suspicion about any improper transaction. SLPS values this input and each person should feel free to raise issues of concern, in good faith, without fear of retaliation. Employees and representatives of SLPS will not be disciplined, demoted, lose their jobs, or be retaliated against for asking questions or voicing concerns about conduct of this sort.

SLPS will investigate any possible fraudulent or dishonest use or misuse of SLPS's resources, any abuse, discrimination, or failure to provide reasonable accommodation by management and staff. SLPS will take appropriate action against anyone found to have engaged in fraudulent, dishonest, abusive or discriminatory conduct, including disciplinary action by SLPS. When warranted, civil or criminal prosecution may also be pursued.

Therefore, all members of SLPS staff and other interested persons are encouraged to report possible fraudulent or dishonest conduct pursuant to the procedures set forth below.

## **Policy Details**

### I. Intent of Policy

- a. This policy is intended to protect any individual who engages in good faith disclosure of alleged wrongful conduct to an SLPS official. More specifically it:
  - i. Encourages individuals to disclose wrongful conduct engaged in by others to the appropriate SLPS official so that prompt, corrective action can be taken by SLPS,
  - ii. Informs individuals how allegations of wrongful conduct can be disclosed,
  - iii. Protects individuals from reprisal by adverse employment action or other retaliation as a result of having disclosed wrongful conduct (individuals who self report their own misconduct are not afforded protection by this policy), and
  - iv. Provides individuals, who believe they have been subject to reprisal or false allegations, a fair process to seek relief from these acts.
- b. This policy is also intended to protect against false allegations of wrongful misconduct. Any person who makes a claim under this policy in bad faith, or knows or has reason to know that such claim is false or materially inaccurate, shall be subject to disciplinary sanctions, including reprimand, suspension, demotion or, under appropriate circumstances, termination.
- c. Nothing in this policy is intended to interfere with legitimate employment decisions.

### II. Regulations

- a. Acting in good faith  
Anyone making a protected disclosure or filing a complaint concerning a violation or suspected violation of this policy must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of this policy.
- b. False allegation  
Any employee or interested person who knowingly or with reckless disregard for the truth, gives false information or knowingly makes a false report of wrongful conduct or a subsequent false report of retaliation will be subject to disciplinary action, up to and including termination. Allegations that are not substantiated yet are made in good faith are not subject to corrective action.
- c. Retaliation  
No individual who makes a protected disclosure will suffer harassment, retaliation, or adverse employment consequences. Any person who retaliates against any individual who makes a protected disclosure is subject to discipline up to and including termination. This policy is intended to encourage and enable employees and others to raise serious concerns within SLPS prior to seeking resolution outside the District.

d. Confidentiality

Protected disclosures may be made on a confidential basis by the complainant or may be submitted anonymously by filing a written report in the designated Compliance Reporting Administrator's (CRA) inbox. Anonymous reports must include sufficient corroborating evidence to justify initiating an investigation. (Please note that anonymous reports are difficult to substantiate since no additional information can be requested from the person submitting the report) Protected disclosures and investigatory records will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. However, employees and others must clearly understand that they have no absolute guarantees regarding confidentiality once the investigative report is turned over to appropriate law enforcement agencies.

e. Handling Protected Disclosures

The CRA will acknowledge receipt of the reported violation or suspected violation to the disclosing individual (if her or his identity is known) upon receipt. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

III. Reporting Violations

- a. Reports to the CRA must contain: the date on which the criminal conduct and/or suspicious activity occurred if known, a description of the activity and the name(s) of anyone involved in the activity. SLPS will receive and document reports, and will document their disposition.
- b. All reports of criminal conduct and/or suspicious activity received by the CRA will be date-stamped upon arrival. The CRA will review and ensure that the report is investigated within 30 days from receipt of the complaint. If greater time is necessary to review and investigate the complaint, the CRA shall make note of the reasons for the delay.