

NOVA CLASSICAL ACADEMY
MANUAL OF POLICIES APPROVED BY THE BOARD OF DIRECTORS

POLICY NP 402:

REPORTING UNETHICAL OR ILLEGAL ACTIVITY

I. PURPOSE

The purpose of this policy is to promote the reporting of suspected or actual unethical or illegal activity.

II. GENERAL STATEMENT OF POLICY

Nova Classical Academy requires directors, officers, and employees to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the school, they must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

III. RESPONSIBILITY

It is the responsibility of all directors, officers, and employees to comply with this policy and to report violations or suspected violations in accordance with this policy.

IV. NO RETALIATION

No director, officer, or employee who in good faith reports a violation shall suffer harassment, retaliation, or adverse employment consequence. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. This policy is intended to encourage and enable employees and others to raise serious concerns within the school prior to seeking resolution outside the school.

V. REPORTING VIOLATIONS

The school promotes an open-door policy and suggests 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 an employee is not comfortable speaking with his/her supervisor or is not satisfied with the supervisor's response, the employee is encouraged to speak with Nova's Executive Director or someone on the Board of Directors. Supervisors and administration are required to report suspected violations to the Board Chair or Treasurer, or other board member as appropriate.

VI. BOARD CHAIR AND TREASURER

The Board Chair and Treasurer are considered the school's Compliance Officers and are responsible for investigating and resolving all reported complaints and

allegations concerning violations and shall advise the entire Board of Directors and the Executive Director. The Board Chair and Treasurer will report to the entire Board of Directors at least annually on compliance activity.

If the allegation is against the Board Chair or Treasurer, the complaint should be made to any other Board member who shall call a closed meeting, at which time the Board shall consider the allegations and designate responsibility for investigating the allegations

VII. ACCOUNTING AND AUDITING MATTERS

The Budget & Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding the school's accounting practices, internal controls or auditing. The Budget & Finance committee will report all complaints or concerns to the entire Board of Directors.

VIII. ACTING IN GOOD FAITH

Anyone filing a complaint concerning a violation or suspected violation of the law, Nova's faculty and staff handbook, or other policies must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations proven to have been made knowing them to be false will be viewed as a serious disciplinary offense.

IX. PRIVACY

Violations or suspected violations may be submitted anonymously. However, non-anonymous reports are encouraged in light of the potential need to conduct an adequate investigation. Reports of violations or suspected violations will be kept private to the extent possible, consistent with the Minnesota Government Data Practices Act and the need to conduct an adequate investigation.

X. HANDLING OF REPORTED VIOLATIONS

The Board Chair or Treasurer will notify the sender (of a non-anonymous complaint) and acknowledge receipt of the alleged violation or suspected violation within five business days. All reports will be promptly investigated when appropriate and appropriate corrective action will be taken if warranted by the investigation.

Resource: St. Croix Preparatory Academy policy 103: Reporting Unethical or Illegal Activity

Cross References: Policy 414 (Mandatory Reporting of Child Neglect or Physical or Sexual Abuse)
Policy 413 (Harassment and Violence)
514 (Bullying Prohibition)

ADOPTED BY THE BOARD: 07/29/2019
REVISED BY THE BOARD:
EFFECTIVE DATE: 07/29/2019