



SECTION IV: EMPLOYEE POLICIES 4020

Whistleblower Policy

The Board of Education (“Board”) of Oklahoma Virtual Charter Academy (“OVCA”) 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. As such, the Board hereby adopts this policy to provide a process for such reporting.

Definition:

“Protected Disclosure” means an allegation, made in good faith, that the Oklahoma Virtual Charter Academy or one or more of its employees, contractors (acting in the course of its work for the Oklahoma Virtual Charter Academy) or members of the Board of Directors, has in the course of his, her or its duties to the Oklahoma Virtual Charter Academy acted unlawfully or in violation of published Board of Directors’ policies, laws, and regulations.

Preamble:

The Oklahoma Virtual Charter Academy 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 Oklahoma Virtual Charter Academy’s controls and operating procedures are intended to deter, detect and prevent improper activities, as at any institution, intentional and unintentional violations of laws, regulations, and policies may occur. This policy is intended to result in the internal identification and remediation of such violations.

Policy:

Reporting Protected Disclosures:

Any person may make a Protected Disclosure. It is the responsibility of all employees and board members 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. 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 Oklahoma Virtual Charter Academy.

Protection from Retaliation:

The Oklahoma Virtual Charter Academy 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 an order that is illegal or in violation of published Board of

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Director's policies, and from 2) directly or indirectly using or attempting to use the authority or influence of his or her position 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.

Investigations:

Individuals to whom a Protected Disclosure is made are required to report them to the head of school, and Board Chair within forty-eight (48) 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. The head of school will immediately advise the board chair of all Protected Disclosures regarding accounting practices, internal fiscal controls or auditing. 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 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.