

Seaside School, Inc. and Seaside School Foundation, Inc.
WHISTLEBLOWER PROTECTION POLICY

adopted by the Seaside School, Inc. on 1/24/13
adopted by the Seaside School Foundation, Inc. on 12/19/12

- I. **Introduction:** Both the Seaside School, Inc. (the "School") and the Seaside School Foundation, Inc. (the "Foundation") expect all staff and members of their Board of Directors to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees, officers, and representatives of the School and Foundation, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations. Set forth below is the policy of the School and Foundation with respect to reporting good-faith concerns about the legality or propriety of the actions or plans of the School and Foundation.

- II. **Whistleblower:** A "whistleblower" under this policy is any employee, officer or board member of the School or Foundation who reports, in accordance with this Policy, conduct or a practice that he/she reasonably and in good faith believes is in violation of applicable law, regulations or School or Foundation policies. The whistleblower is not required or permitted to investigate the activity or to determine fault or corrective measures; as appropriate, the Chair of the governing board, Directors of the governing Board and School Principal are charged with such responsibilities.

- III. **Reporting of Concerns or Complaints:** If an individual has knowledge of, or a reasonable, good-faith belief that, unlawful or fraudulent activity has occurred or is occurring, the individual is to report it to any of the following who is not the offending person: the Chair of the School Board or the Vice Chair of the School Board or the Chair of the Foundation Board or the Vice Chair of the Foundation Board or the School Principal. The reporting individual must exercise sound judgment to avoid baseless allegations. An individual who intentionally makes a false report may be subject to discipline, up to and including termination, in the case of employees and removal from office in the case of School Board Directors, Foundation Board Directors and other volunteers.

- IV. **Reportable Activities:** Examples of activities that may be reported under this policy are violations of federal, state or local laws or regulations and violations of School or Foundation policies, including fraudulent financial reporting or violations of accounting or financial policies.

- V. **Protection.** Whistleblower protections are provided in two important areas -- confidentiality and against retaliation. Insofar as consistent with a thorough and appropriate investigation or the requirements of law, the confidentiality of the whistleblower will be maintained. Any whistleblower who believes he/she has been or is being subjected to (or has witnessed or otherwise has knowledge of) retaliatory treatment should immediately report it in the manner described above. Retaliatory conduct is grounds for immediate discipline, up to and including termination or removal. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated.

- VI. **Questions & Annual Review**
 - A. Employees with questions regarding this policy should contact the School Principal.
 - B. Board members or others with questions regarding this policy should contact the Chair of the Board on which they serve
 - C. To honor the purpose and spirit of this policy, all School and Foundation Directors, officers and staff shall review and acknowledge their understanding of this policy on an annual basis.

Acknowledgement

I HEREBY CONFIRM that I have read and understand this Whistleblower Protection Policy and will strive to uphold it to the best of my ability.

Signature

Date