

WHISTLEBLOWER PROTECTION/ANTI-RETALIATION

PURPOSE: To ensure Board members and employees observe high standards of business and personal ethics and comply with all applicable laws, District regulations and policies in the conduct of their duties and responsibilities; and to encourage open and honest communication relevant to the District's governance, finances and compliance with applicable laws and regulations.

This Whistleblower Protection/Anti-Retaliation Policy is intended to encourage and enable employees to make good faith reports within the District of unlawful or improper conduct and reflects the practices and principles of behavior that support this commitment.

It is important that the District be promptly notified of unlawful or improper behavior including, but not limited to, any of the following conduct:

- * Harm or potential harm to students¹
- * Theft of property or embezzlement or misuse of funds
- * Financial reporting that is fraudulent, intentionally misleading, or negligent in any manner
- * Improper or undocumented financial transactions
- * Forgery or alteration of documents
- * Unauthorized alteration or manipulation of computer files
- * Fraudulent destruction of records
- * Improper use or sale of District assets, including but not limited to its funds, supplies, intellectual property, and other assets
- * Improper access or use of confidential employee, student or donor information
- * Authorizing or receiving compensation for goods not received or services not performed
- * Violation of the District's conflict of interest policy
- * Any other improper occurrence regarding cash, property, financial procedures or reporting
- * Any abuse of or discrimination against a District employee, student, parent, vendor or person connected with any of the foregoing
- * Failure by the District to provide a reasonable accommodation for disability or religious belief
- * Retaliation against a whistleblower

Any employee of the District who has a reasonable, good faith belief or suspicion about any of the above conduct shall promptly report the conduct to the District. The District values this input and each employee should feel free to make such reports without fear of retaliation. Therefore, the Board directs the Superintendent of Schools to provide regulations that instruct employees on the procedures and personnel responsible for implementing this Whistleblower Protection/Anti-Retaliation Policy.

CONFIDENTIALITY: To assure the reporting of any activity that threatens the efficient administration of the District, reports that disclose improper activities shall be handled with sensitivity, discretion and confidentiality to the extent allowed by the circumstances and the law.

NON-RETALIATION: Employees will not be unlawfully retaliated against for making good faith reports under this policy. While the District has separate policies that cover harassment and employment discrimination (see 4901, 4901-R and 4902), this Whistleblower Protection/Anti-Retaliation Policy also applies to these situations to encourage the reporting of such wrongful actions against the District's interest.

DEFINITIONS:

Good Faith Report - a report of misconduct of the type identified in this policy which is made without malice or consideration of personal benefit and which the person making the report has reasonable cause to believe is true. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously, or with reckless disregard for the truth or falsity, is a serious offense and may lead to disciplinary action, up to and including termination.

Whistleblower - a person who witnesses or has evidence of misconduct of the type identified in this policy while employed by the District and who makes a good faith report of the suspected fraud, financial improprieties, irregularities, or conflicts of interest, verbally or in writing, to one of the person's superiors, to an agent of the employer or to an appropriate authority.

¹ Pursuant to Tulsa Public Schools Policy 2110, Reporting Child Abuse, and to Oklahoma law, any District employee who suspects that a child under the age of eighteen (18) years is a victim of abuse or neglect must promptly report directly to the Department of Human Services.