

2170	Ethical Compliance Policy
Approval Date:	April 2013
Category:	School Board Governance
Governance Accountability:	Board of Directors, Leadership
Audience:	Employees

Pine Lake Preparatory follows and enforces all federal, state and local laws applicable to it and to require its employees to do likewise. Moreover, employees are also specifically expected and required to adhere to all policies and requirements adopted by the Board of Directors. Every employee has personal responsibility to assist in implementing these expectations. Suspected violations of these requirements will be investigated promptly and will be treated in a fair and impartial manner. Moreover, employees are expected to promptly report concerns or potential violations of any Pine Lake Preparatory policy or procedure, or any applicable law, rule or regulation as soon as it is discovered internally to their immediate supervisor, Head of Schools or the Board Chairperson, if and as applicable, so that Pine Lake Preparatory has an opportunity to conduct its own independent review and take appropriate steps to address the same, where and as applicable. Concerns or violations related to the Board Chairperson may also be reported to any other Board Officer. An “immediate supervisor” is required to report a complaint to the Building Heads, Board Chairperson, or a Board Officer if the complaint relates to the Board Chairperson.

All such reports will be treated confidentially to the extent practicable under the circumstances and in accordance with the legal obligations of Pine Lake Preparatory. Any retaliation or threat of retaliation against any employee for reporting in good faith a violation or suspected violation is itself a violation of this policy, may be a violation of the law, and will result in corrective action, up to and including termination of employment. This is the case even in such instances when, after investigation, it has been determined there has not been an actual legal or other violation.

Administrators and/or staff who disregard or fail to report allegations of harassment that have been reported to them by the person who is the subject of the harassment are in violation of this policy and subject to disciplinary action.

Alternative Reporting Options

An employee may bypass the direct chain of command when expressing any issue of concern regarding alleged discrimination or harassment if his/her concern involves their immediate supervisor. In those circumstances, the employee may seek out another supervisory level employee, such as their Building Head or any other, to share his/her concern.

Investigative Process

All reports made or received under this policy will be reviewed and/or investigated as deemed appropriate by Pine Lake Preparatory, and appropriate action taken to address the matter. During the investigative process, information should be shared only on a need to know basis so as to be sensitive to the privacy concerns of all employees involved.

All complainants and all persons accused of any violation of this policy shall fully cooperate with any investigation, including supplying written statements if requested.

In addition, all other persons associated with Pine Lake Preparatory shall cooperate fully in any investigation under this policy.

False Accusations and Information

Pine Lake Preparatory recognizes that false accusations under this policy and the providing of false information in an investigation can have a serious effect on innocent persons. Thus, while Pine Lake Preparatory encourages the reporting of unwelcome conduct perceived to be a violation of this policy, if Pine Lake Preparatory determines that a person has intentionally provided false information in making a complaint or in an investigation under this policy, Pine Lake Preparatory will take appropriate disciplinary action, up to and including termination.

Protection Against Retaliation

Pine Lake Preparatory prohibits retaliation against any individual who makes a complaint in good faith under this policy or against any individual who participates in good faith in an investigation under this policy. Retaliation is itself a violation of this policy and should be reported in the same manner as a complaint of discrimination or harassment. Any attempt to coerce, intimidate or retaliate against anyone who in good faith complains of a violation of this policy or who in good faith participates in an investigation under this policy will not be tolerated. If Pine Lake Preparatory determines

that such retaliation has occurred, Pine Lake Preparatory will take appropriate disciplinary action, up to and including termination.