



Whistleblower Policy Adoption

Whereas it is the responsibility of the Board of Trustees, administrators, faculty, and staff to observe high standard of business and personal ethics in the conduct of their duties and responsibilities.

Now therefore be it resolved that the Board of Trustees adopts the following whistleblower policy for trustees, employees and other members of the School community to raise serious concerns so that the School can address and correct inappropriate conduct and actions promptly.

WHISTLEBLOWER POLICY

Mount Tamalpais School requires members of its Board of Trustees, its administrators, faculty, and staff to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Trustees and employees of the School must fulfill their responsibilities with honesty and integrity, and comply with all applicable laws and regulations.

This Whistleblower Policy is intended to encourage and enable trustees, employees and other members of the School community to raise serious concerns so that the School can address and correct inappropriate conduct and actions promptly. It is the responsibility of all Trustees, employees and volunteers to report concerns about suspected violations of law or regulations that govern the School's operations, questionable or improper accounting or auditing matters, or the failure of any trustee, employee or volunteer of the School to perform his or her duties honestly and with integrity.

No Retaliation

It is contrary to the values of the School for anyone to retaliate against any member of the School community who in good faith reports a matter in accordance with this Whistleblower Policy. 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. Anyone who believes they have been subject to retaliation for reporting a concern, should immediately inform the Head of School or the Chair of the Board of Trustees.

Reporting Procedure

Any member of the School community, including trustees, employees, volunteers and parents, who has a concern regarding suspected violations of law or regulations that govern the School's operations, financial improprieties or fraud (including accounting

and auditing matters), or the failure of any trustee, employee or volunteer of the School to perform his or her duties honestly and with integrity, should follow one of the following procedures:

1. Head of School: A person wishing to raise a concern should contact the Head of School, by telephone at 415-383-9434, email or in person or by delivering a sealed envelope addressed to the Head of School at 100 Harvard Avenue, Mill Valley, CA 94941, to submit the concern.
2. Board Representative: If the concern involves the Head of School or a trustee, or if the person reporting the matter is not comfortable contacting the Head of School, the concern should be submitted to the President of the Board of Trustees at trustees@mttam.org or by delivering a sealed envelope addressed to the President of the Board of Trustees at 100 Harvard Avenue, Mill Valley, CA 94941.
3. Finance Committee: If the concern involves financial improprieties or fraud, the concern should be submitted to the President of the Board of Trustees at trustees@mttam.org or to the Chair of the Finance Committee of the Board of Trustees by delivering a sealed envelope addressed to the Chair of the Finance Committee, Board of Trustees at 100 Harvard Avenue, Mill Valley, CA 94941.

Complaints may be submitted anonymously, but the School's ability to investigate and address may be limited if a complaint is submitted anonymously.

Review of Concerns

How concerns are reviewed depends on the subject of the concern.

1. For concerns involving personnel or student/parent matters not involving the Head of School or a Trustee, the Head of School will review the concern, conduct an investigation as appropriate and respond to the person reporting the concern if that person has identified him or herself. The Head of School may also delegate investigation to appropriate School personnel. If the person reporting the concern is not satisfied with this response, he or she may request a further review by submitting a request to the President of the Board of Trustees.
2. For concerns involving the Head of School or a trustee, the Board President will review the concern, conduct an investigation as appropriate, consult with the Executive Committee of the Board of Trustees and respond to the person reporting the concern if the person has identified him or herself. The Board President may also delegate investigation to other members of the Board of Trustees. If a member of the Board of Trustees is implicated in the concern in any way, that member will recuse him or herself from any consideration of the concern.
3. For concerns involving financial improprieties or fraud, the Finance Committee of the Board of Trustees will review the concern, conduct an investigation as appropriate and respond to the person reporting the concern if that person has identified him or herself. If a member of the Finance Committee is implicated in

the concern in any way, that member will recuse him or herself from any consideration of the concern.

All submissions, inquiries and discussions will be documented by the person or committee reviewing the concern in a confidential file. On quarterly basis or more often as directed by the Board, the Head of School and the President of the Board of Trustees shall provide a report to the Board concerning the number of complaints submitted under this policy and, for each complaint, the nature of the complaint and the resolution of the complaint.

Confidentiality

Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and to address the concern.

Reference 5-3-16 Minutes