

## WHISTLEBLOWER POLICY

San Domenico 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 (415) 258-1969, email: [cstock@sandomenico.org](mailto:cstock@sandomenico.org), or in person, to submit the concern.
2. Chair of the Board of Trustees: 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 Chair of the Board of Trustees or another one of the board officers. Updated contact information for the Chair and other officers of the board will be posted on the website of the school.
3. Audit Committee: If the concern involves financial improprieties or fraud, the concern should be submitted to the Chair of the Audit Committee of the Board of Trustees. Updated contact information for the Chair of the Audit Committee will be posted on the website of the School.

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

### **Review of Concerns**

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

1. For concerns relating to violation of School's policies that provide a complaint procedure, such as the School's policies against discrimination or harassment, the concern should be handled in accordance with the applicable policy.
2. For other 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 or outside consultants. 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 Chair of the Board of Trustees.
3. For concerns involving the Head of School or a trustee, the Board Chair will review the concern, conduct an investigation as appropriate, consult with the Executive Committee and respond to the person reporting the concern if the person has identified him or herself. The Board Chair may also delegate investigation to other members of the Board of Trustees or outside consultants. 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.
4. For concerns involving financial improprieties or fraud, the Audit 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 Audit 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 an annual basis or more often as directed by the Board, the Head of School and the Chair 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.