



## **Whistleblower Policy**

### **Purpose**

John Knox Christian School – (the “School”) is committed to the highest ethical standards; therefore, the School requires directors, employees, contracted workers, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of the School (both employee and volunteer), we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

The purpose of this policy is to encourage directors, employees, volunteers and others to raise serious concerns within the School and be assured that in making the complaints, they will be protected from harassment, retaliation or adverse employment consequence for raising such concerns in good faith.

### **Definitions**

#### **The Complainant**

For the purpose of this policy, the “Complainant” is meant to be any director, employee, volunteer, or member of the School community who has reported a Reportable Activity.

#### **Reportable Activity**

“Reportable Activity” covers instances where an employee, volunteer or other stakeholder has evidence of activity by any School officer, employee, volunteer or retained consultant (including external auditors) that to his/her knowledge constitutes (but not limited to):

- Accounting, auditing, or other financial reporting fraud or misrepresentation;
- Violations of federal or provincial laws that could result in fines or civil damages payable by the School, or that could otherwise significantly harm the School’s reputation or public image;
- Unethical business conduct in violation of any School corporate policy, including, but not limited to the Code of Conduct;
- Danger to the health, safety, or well-being of employees, volunteers, students and/or the general public (including any real or perceived threat of workplace violence or harassment).

### **Reporting Responsibility**

It is the responsibility of all directors, employees, and volunteers to report violations or suspected violations in accordance with this Whistleblower Policy.

## **No Retaliation**

No director, officer or employee who in good faith reports a violation shall suffer harassment, retaliation or adverse employment consequence. An employee or volunteer (including directors and officers) who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment or dismissal from office. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns within the School prior to seeking resolution outside the School.

Any instances of retaliation should be reported to the Principal or Board Chair.

## **Reporting Violations**

A Complainant may submit their concerns in writing to either the Principal, Board Chair or Treasurer by completing the reporting form. The complaint will be treated with utmost confidence and not discussed with others except to the minimum extent necessary to conduct a complete and fair investigation. In all cases, the person who is alleged to have committed the infraction will be made aware of the complaint at an appropriate point during the investigation.

## **Accounting and Auditing Matters**

The audit and finance committee of the board of directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Treasurer or Board Chair shall immediately notify the audit and finance committee of any such complaint and work with the committee until the matter is resolved.

## **All Other Reportable Activity**

The Executive Committee shall address all other Reportable Activity concerns or complaints. The Board Chair or Principal shall immediately notify the Executive Committee of any such complaint and work with the committee until the matter is resolved.

## **Acting in Good Faith**

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 knowingly to be false will be viewed as a serious disciplinary offense.

## **Handling of Reported Violations**

The Board Chair or Audit and Finance Committee will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

All reports pertaining to Reportable Activity and any resulting investigations will be retained in a confidential location for a period of not less than seven (7) year. Such preservation obligation shall include the making of written summaries of any oral complaints or reportable activity.

# Whistleblower Reporting Form

John Knox Christian School will treat all reports made under this policy in a confidential and sensitive manner. John Knox Christian School will exercise care to keep your identity confidential until a formal investigation is launched. At that point, your identity will be disclosed to the other individuals only to the extent necessary to conduct a complete and fair investigation.

Name: \_\_\_\_\_

Telephone: \_\_\_\_\_

Email: \_\_\_\_\_

**Please provide details of the suspected Reportable Activity (attach separate paper if needed)**

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**Please provide the names of all persons involved in the situation, including any other persons aware of the suspected Reportable Activity.**

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**Please provide as specifically as possible the relevant dates and time periods related to the suspected Reportable Activity.**

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**Has the suspected Reportable Activity been brought forward to any other authority? If so, what was the result?**

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**Please provide any further information that you believe is relevant to the situation.**

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**Would you like to arrange a meeting to discuss this matter? Yes  No**

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**Please submit this form to the Principal, Board Chair or Treasurer.**