

Adopted: October 23, 2025

Reviewed: _____

Twin Cities International Schools

WHISTLEBLOWER POLICY (496)

I. Policy Statement and Purpose

TCIS is committed to operating with the highest standards of ethics, integrity, and accountability. This Whistleblower Policy is established to encourage and enable employees, board members, and volunteers to raise serious concerns about potential violations of law, breaches of financial or ethical policies, or other improper conduct within TCIS without fear of retaliation. This policy aims to ensure that TCIS acts promptly and appropriately to investigate and address such concerns, thereby promoting a culture of transparency and compliance.

This policy is adopted in compliance with Minnesota Statutes, including, but not limited to, Chapter 124E (Minnesota Charter School Law) and Chapter 181.932 (Whistleblower Protection Act).

II. Scope

This policy applies to all TCIS employees, including teachers, administrators, support staff, independent contractors, volunteers, and members of the TCIS School Board of Directors.

III. Definitions

- **Whistleblower:** An individual who reports a concern under this policy.
- **Improper Conduct:** For this policy, improper conduct includes, but is not limited to:
 - Violations of federal, state, or local laws or regulations.
 - Fraud, waste, or abuse of school funds or resources.
 - Mismanagement or misuse of school property.
 - Serious breaches of school policies or ethical guidelines.
 - Conflicts of interest.
 - Unethical or illegal accounting or auditing practices.
 - Dangers to public health or safety, or substantial and specific dangers to the school's students or staff.
 - Retaliation against another individual for reporting a concern under this policy.
- **Retaliation:** Any adverse action against a whistleblower for making a good-faith report under this policy. This includes, but is not limited to, termination, demotion, suspension, harassment, reduction in pay or hours, or any other action that materially affects the terms and conditions of employment or volunteer service.

IV. Reporting Procedures

A. How to Make a Report: Individuals are encouraged to report concerns about improper conduct as soon as they become aware. Reports can be made orally or in writing.

- **Initial Reporting:**

Concerns should generally be reported to the Whistleblower Designee, who is Abdirashid Warsame, Executive Director, Warsame Shirwa, Board Chair, or Paul Ditter, HR Specialist.

- *Consideration for TCIS:* The School Director or a designated Board Officer (e.g., Board Chair or Treasurer) might be the most appropriate initial contact for a smaller charter school. Ensure this individual is prepared to handle such reports confidentially and impartially.

- **Alternative Reporting (when initial reporting is not appropriate):**

If the concern involves the Whistleblower Designee, or if the whistleblower believes that reporting to the Whistleblower Designee would not be practical or appropriate (e.g., due to a conflict of interest), the report should be made directly to the secretary or clerk of the board or the governance committee.

- *Consideration for TCIS:* Having a board-level alternative is crucial.

B. Information to Include in a Report (if possible): While not required for a report to be considered, providing the following information can assist in the investigation:

- A clear and concise description of the concern, including specific dates, times, and individuals involved.
- Any supporting documentation or evidence.
- The whistleblower's contact information (optional, but encouraged for follow-up). Reports may be made anonymously, but the ability to investigate may be limited if the identity of the whistleblower is unknown and no other information is provided.

C. Confidentiality: All reports will be treated with the utmost confidentiality consistent with the need to conduct a thorough investigation and comply with legal requirements. The identity of the whistleblower will be protected to the extent possible, unless disclosure is necessary for the investigation, required by law, or authorized by the whistleblower.

V. Investigation and Resolution

A. Acknowledgment of Report: Upon receipt of a report, the Whistleblower Designee (or Alternative Designee) will acknowledge receipt within five (5) business days to the whistleblower, if contact information was provided.

B. Investigation Process:

- The Whistleblower Designee (or Alternative Designee) will promptly assess the report and determine the appropriate course of action.
- An impartial investigation will be conducted as soon as practical. The investigation may involve interviewing individuals, reviewing documents, and gathering other relevant information.
- The investigation will be conducted fairly and objectively, respecting the rights of all individuals involved.
- The Whistleblower Designee (or Alternative Designee) may engage external legal counsel, auditors, or other experts as deemed necessary to conduct the investigation.

C. Documentation: A record of all reports and the results of investigations will be maintained in a confidential manner by the Whistleblower Designee (or Alternative Designee).

D. Resolution and Corrective Action:

- Upon completion of the investigation, appropriate corrective action will be recommended and implemented if the allegations are substantiated.
- The Whistleblower Designee (or Alternative Designee) will communicate the general outcome of the investigation to the whistleblower, if contact information was provided and it is legally permissible to do so, without disclosing confidential information related to personnel or specific disciplinary actions.

VI. No Retaliation

A. Protection Against Retaliation: TCIS strictly prohibits retaliation against any individual who, in good faith:

- Reports a concern under this policy.
- Provides information or otherwise assists in an investigation under this policy.
- Refuses to participate in an activity that the individual believes is improper conduct.

B. Good Faith Reporting: This policy protects individuals who make reports in good faith, meaning they have a reasonable belief that the information they are reporting is true, even if the investigation ultimately proves the information to be inaccurate. It does not protect individuals who knowingly make false reports or those who make reports with malicious intent.

C. Reporting Retaliation: Any individual who believes they have been subjected to retaliation for making a report under this policy should immediately report the alleged retaliation to the Whistleblower Designee (or Alternative Designee, if the retaliation

concern involves the Whistleblower Designee). All reports of retaliation will be promptly investigated and addressed.

D. Minnesota Whistleblower Protection Act (Minnesota Statutes § 181.932): This policy aligns with the protections offered under the Minnesota Whistleblower Protection Act, which prohibits employers from discharging, disciplining, threatening, otherwise discriminating against, or penalizing an employee regarding the employee's compensation, terms, conditions, location, or privileges of employment because: (a) the employee, or a person acting on behalf of an employee, in good faith, reports a violation or suspected violation of any federal or state law or rule adopted pursuant to law to an employer or to any governmental body or law enforcement official; (b) the employee is requested by a public body or office to participate in an investigation, hearing or inquiry; (c) the employee refuses to obey an order to perform an action that the employee has an objective basis in fact to believe violates any federal or state law or rule or regulation adopted pursuant to law, and the employee informs the employer of the refusal and the basis for the refusal; (d) the employee refuses to participate in a retaliatory action; or (e) the employee participates in an investigation or proceeding conducted by a governmental body or law enforcement official.

VII. Dissemination and Training

This policy will be distributed to all TCIS employees, board members, and volunteers. New employees will receive a copy during their orientation. The policy will also be readily available on the school's website or in a central location. Training on this policy will be provided periodically to ensure understanding and compliance with it.

VIII. Policy Review

The school Board of Directors will review this policy at least annually, or more frequently as needed, to ensure its effectiveness and compliance with applicable laws and regulations.