

BETTIS PREPARATORY LEADERSHIP ACADEMY

WHISTLEBLOWER PROTECTION POLICY

I. PURPOSE

Bettis Preparatory Leadership Academy (BPLA) is committed to maintaining a safe, ethical, transparent, and accountable educational environment.

The purpose of this Whistleblower Protection Policy is to encourage employees, Board of Trustees members, volunteers, contractors, parents, and other members of the BPLA community to report suspected unlawful, unethical, fraudulent, unsafe, or improper conduct without fear of retaliation.

BPLA prohibits retaliation against any individual who makes a good-faith report or participates in an investigation under this policy.

II. SCOPE

This policy applies to:

- Employees;
- Administrators;
- Teachers;
- Board of Trustees members;
- Volunteers;
- Contractors and vendors;
- Interns and temporary personnel; and
- Other individuals acting on behalf of BPLA.

This policy applies to reports concerning BPLA operations, employees, students, financial activities, governance, safety, compliance, and other school-related matters.

III. REPORTABLE CONDUCT

Individuals are encouraged to report concerns involving suspected:

1. Violation of federal, state, or local law;
2. Fraud, theft, embezzlement, or misuse of school funds or property;
3. Financial misconduct or falsification of financial records;
4. Conflicts of interest or undisclosed financial interests;
5. Falsification or alteration of school records;
6. Serious violations of BPLA policies or procedures;
7. Abuse, neglect, exploitation, or mistreatment of students;
8. Violations involving student safety;
9. Discrimination, harassment, or unlawful employment practices;
10. Improper interference with required educational or special education services;
11. Serious violations of state or federal education requirements;
12. Improper destruction, concealment, or alteration of records;
13. Unsafe working or learning conditions;
14. Cybersecurity, privacy, or unauthorized access concerns;
15. Retaliation against an individual who has made a protected report; or
16. Other conduct that an individual reasonably believes constitutes serious wrongdoing.

Nothing in this policy prevents an individual from reporting a matter directly to an appropriate government or law-enforcement agency when permitted or required by law.

IV. GOOD-FAITH REPORTING

A report should be made in good faith.

A **good-faith report** is one made with an honest belief that the information reported may involve misconduct, a violation of law, a serious policy violation, fraud, safety concerns, or another matter covered by this policy.

An individual does not need to prove that wrongdoing occurred before making a report.

However, knowingly making a false, malicious, or intentionally misleading report may result in appropriate disciplinary action.

V. REPORTING PROCEDURES

Individuals are encouraged to report concerns as soon as reasonably possible.

A. Reports to Administration

Employees and other individuals may report concerns to:

Principal / School Administration

Bettis Preparatory Leadership Academy
69 Nicholson Road
Trenton, South Carolina
Phone: 803-663-7266

Reports may be made verbally or in writing.

Whenever possible, written reports should include:

- Date and approximate time of the incident;
- Description of the concern;
- Individuals involved;
- Location;
- Names of witnesses, if known;
- Supporting documentation or evidence, if available; and
- Any immediate safety concerns.

B. Reports Involving the Principal

If the concern involves the Principal or the individual receiving the report, the concern should be submitted to the **Chair of the BPLA Board of Trustees** or another designated Board representative.

C. Reports Involving a Board Member

If the concern involves a Board member, the report should be made to the Board Chair or another Board officer who is not involved in the allegation.

D. Emergency or Mandatory Reports

Nothing in this policy replaces mandatory reporting requirements.

When a matter involves an immediate threat to health or safety, suspected child abuse or neglect, criminal conduct, or another matter requiring immediate governmental notification, the individual should contact the appropriate emergency, law-enforcement, child-protection, regulatory, or governmental authority as required by law.

VI. CONFIDENTIALITY

BPLA will make reasonable efforts to protect the confidentiality of individuals who make reports under this policy.

However, confidentiality cannot always be guaranteed.

Information may need to be disclosed when necessary to:

- Conduct a fair investigation;
- Protect students or employees;
- Comply with legal requirements;
- Respond to law-enforcement or governmental requests;
- Take corrective action; or
- Provide due process to individuals involved in an investigation.

BPLA will limit disclosure of information to individuals with a legitimate need to know, to the extent reasonably possible.

VII. ANONYMOUS REPORTS

BPLA will accept anonymous reports when reasonably possible.

Individuals making anonymous reports are encouraged to provide sufficient information to allow the school to investigate the concern.

Because anonymous reporting may limit BPLA's ability to obtain additional information, conduct a complete investigation, or provide feedback to the reporting individual, individuals are encouraged to identify themselves when they feel comfortable doing so.

VIII. PROTECTION AGAINST RETALIATION

BPLA strictly prohibits retaliation against any individual who, in good faith:

- Reports suspected misconduct;
- Reports a violation of law or policy;
- Raises a safety concern;
- Participates in an investigation;
- Provides information to an investigator;
- Cooperates with a governmental investigation; or
- Exercises a legal right or protected workplace right.

Retaliation may include, but is not limited to:

- Termination;
- Demotion;
- Reduction in hours or responsibilities;
- Unjustified disciplinary action;
- Threats or intimidation;
- Harassment;
- Unreasonable changes in working conditions;
- Denial of opportunities;
- Exclusion or ostracism intended as punishment;
- Threatening an employee's job; or

- Other adverse treatment because an individual made or participated in a protected report.

Any individual who believes they have experienced retaliation should report it immediately to BPLA administration, the Board Chair, or another appropriate authority.

IX. INVESTIGATION

BPLA will review reports received under this policy and determine the appropriate course of action.

Depending on the nature and seriousness of the allegation, BPLA may:

- Conduct an internal investigation;
- Assign an administrator or Board representative to investigate;
- Engage an independent investigator;
- Consult legal counsel;
- Refer the matter to law enforcement or another governmental agency;
- Conduct an audit or financial review; or
- Take other appropriate action.

Investigations will be conducted as objectively and promptly as reasonably possible.

Individuals involved in an investigation are expected to cooperate and provide truthful information.

X. CONFLICTS OF INTEREST

Any individual responsible for receiving, investigating, or making decisions concerning a whistleblower complaint must disclose any actual or potential conflict of interest.

A person who is the subject of a complaint, has a personal interest in the outcome, or otherwise cannot remain impartial should not oversee the investigation or final decision.

When appropriate, BPLA may use an independent investigator or outside professional.

XI. CORRECTIVE ACTION

If an investigation determines that misconduct or a policy violation occurred, BPLA will take appropriate corrective action.

Corrective action may include:

- Additional training;
- Policy or procedure changes;
- Corrective action plans;
- Financial controls;
- Restitution when appropriate;
- Disciplinary action;
- Termination of employment or contracts;
- Referral to law enforcement or regulatory authorities; or
- Other appropriate measures.

XII. RECORDKEEPING

BPLA will maintain appropriate records of whistleblower complaints, investigations, findings, and corrective actions in accordance with applicable record-retention requirements.

Records will be maintained securely and access will be limited to individuals with a legitimate need to know.

XIII. NO LIMITATION ON LEGAL RIGHTS

Nothing in this policy is intended to:

- Restrict an individual's legal right to report suspected unlawful conduct to a governmental agency;
- Prevent an individual from participating in a governmental investigation;

- Require an individual to report internally before contacting a government agency when the law permits otherwise;
- Limit mandatory reporting obligations; or
- Interfere with rights protected by federal or state law.

This policy should be interpreted consistently with applicable federal and South Carolina law.

XIV. NON-DISCRIMINATION

BPLA is committed to providing an educational and employment environment free from unlawful discrimination, harassment, and retaliation.

Reports made under this policy will be handled without regard to an individual's race, color, national origin, sex, disability, age, or other status protected by applicable law.

XV. BOARD OVERSIGHT

The BPLA Board of Trustees is responsible for providing appropriate oversight of the school's whistleblower program.

The Board should periodically review:

- The effectiveness of reporting procedures;
- Complaints received;
- Investigation processes;
- Retaliation concerns;
- Corrective actions;
- Financial controls; and
- Opportunities to strengthen organizational accountability.

The Board should ensure that whistleblower concerns involving senior administrators or Board members are handled independently and appropriately.

XVI. EMPLOYEE ACKNOWLEDGMENT

I acknowledge that I have received and reviewed the Bettis Preparatory Leadership Academy Whistleblower Protection Policy. I understand my responsibility to report suspected misconduct, fraud, safety concerns, violations of law or policy, and other serious wrongdoing through appropriate channels.

I also understand that BPLA prohibits retaliation against individuals who make good-faith reports or participate in investigations protected by this policy.

Employee Name: _____

Employee Signature: _____

Date: _____

BPLA Representative: _____

Signature: _____

Date: _____