

## **WHISTLEBLOWER POLICY**

The whistleblower policy of the Barrington Public Schools (“District”) is intended to provide a mechanism for the reporting of illegal activity or the misuse of District assets while protecting employees who make such reports from retaliation.

### **Questionable Conduct**

This policy is designed to address situations in which an employee or volunteer suspects that another employee or volunteer has engaged in illegal acts or questionable conduct involving District assets. This conduct might include outright theft (of equipment or cash), fraudulent expense reports, misstatements of any accounts to any District employee with managerial authority or to the District auditors, or a conflict of interest that results in actual or potential financial harm to the District. The District encourages employees and volunteers to report questionable conduct and has established a reporting system that allows them to do so anonymously.

### **Making a Report**

If an employee or volunteer suspects another of engaging in illegal acts or conduct involving misuse of the District assets, he or she may report such conduct, anonymously if desired, and the reporting individual will be protected against any form of harassment, intimidation, discrimination, or retaliation for making such a report in good faith.

Reports can be made to the Superintendent or to the Chairperson of the School Committee. The District will promptly conduct an investigation into matters reported, keeping the informant’s identity as confidential as possible consistent with the obligation to conduct a full and fair investigation.

In the event that the subject of a proposed complaint is the Superintendent or the Chairperson of the School Committee, a report may be made to the Director of Administration and Finance.

### **No Retaliation**

An individual who has made a report of suspicious conduct and who subsequently believes he or she has been subjected to retaliation of any kind is directed to immediately report such retaliation to the Superintendent or the Chairperson of the School Committee.

Reports of retaliation will be investigated promptly in a manner intended to protect confidentiality as much as practicable, consistent with a full and fair investigation. The party conducting the investigation will notify the individual subject to the alleged retaliation of the results of the investigation.

The District strongly disapproves of and will not tolerate any form of retaliation against those who report concerns in good faith regarding District operations. Any employee who engages in retaliation will be subject to discipline up to and including termination.

## Reporting Procedures

The reporting procedure is intended to describe the process through which concerns about the possible misuse of District assets are handled pursuant to the District whistleblower policy.

1. A report of suspected misuse of District assets is made by reporting to the Superintendent or the Chairperson of the School Committee, or to the Director of Administration and Finance, if appropriate.
2. The report shall be promptly reviewed by the Superintendent or the Chairperson of the School Committee, or to the Director of Administration and Finance, to determine whether the report constitutes a complaint or a non-complaint.
  - A *complaint* means any report involving (i) questionable accounting, auditing, financial reporting, or internal controls; (ii) suspected fraud, theft, or improper use of District assets; (iii) a violation of the District conflict-of-interest policy that results in a financial harm to the District; or (iv) a claim of retaliation against any employee making a good-faith report regarding any of the preceding matters.
  - A *non-complaint* means a report of any other matter not involving a misuse of the District assets.
3. If the report is deemed to be a complaint, it will be promptly investigated and forwarded to the Chairperson of the School Committee, the Superintendent or the Director of Administration and Finance. If the report is deemed to be a non-complaint, it will be referred to the appropriate executive for follow-up. Some non-complaints may involve serious matters and may require prompt investigation, but may nevertheless not involve misuse of District assets.
4. Each complaint shall be fully investigated, and as far as possible handled so as to protect the privacy of the employee making the complaint. A written report of the outcome of each investigation shall be prepared and delivered to the School Committee.
5. The Director of Administration and Finance shall determine whether the report involves a matter that is 'material' for audit purposes.

Approved 01/08/2009