

Whistleblower Policy

Ocean Charter School is committed to lawful and ethical behavior in all of its activities and requires board members, executives, directors and employees to act in accordance with all applicable laws, regulations and policies and to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

The objectives of Ocean Charter School's Whistleblower Policy are to establish policies and procedures to:

- Prevent or detect and correct improper activities
- Encourage each board member, director, and employee (reporting individual) to report what he or she in good faith believes to be a material violation of law or policy or questionable accounting or auditing matter by Ocean Charter School.
- Ensure the receipt, documentation, retention of records, resolution of reports received under this policy, and protect reporting individuals from retaliatory action.

Reporting Responsibility

Each reporting individual has an obligation to report what he or she believes is a material violation of law or policy or any questionable accounting or auditing matter by Ocean Charter School, its officers, directors, employees, or other representatives. Reporters also must notify Ocean Charter School's Director or Board of Trustees Chairperson if an action needs to be taken in order for Ocean Charter School to be in compliance with law, policy, or generally accepted accounting practices. Concerns that should be reported include, but are not limited to, the following:

- Providing false or misleading information on the Ocean Charter School financial documents, grant reports, tax returns or other public documents
- Providing false information to or withholding material information from the Ocean Charter School auditors, accountants, lawyers, directors or other representatives responsible for ensuring compliance with fiscal and legal responsibilities
- Embezzlement, private benefit, or misappropriation of funds
- Material violation of Ocean Charter School policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and document retention
- Discrimination based on race, gender, sexual orientation, ethnicity, and disability or any other unlawful biases;
- Acts that could create a possibility of significant civil or criminal liability for Ocean Charter School, students, or any of its employees.
- Facilitation or concealing any of the above or similar actions

Reporting Concerns

All Ocean Charter School Employees:

Whenever possible, an employee should seek to resolve concerns by reporting issues directly to his/her supervisor or to the next level of management as needed until matters are satisfactorily resolved. However, if for any reason an employee is not comfortable speaking to a supervisor or does not believe the issue is being properly addressed, the employee may contact the Director or the Board of Trustees Executive Committee. If for any reason the aforementioned communication lines are not a possibility, the employee should contact:

California Attorney General: <http://oag.ca.gov/>

Handling of Reporting Violations

Ocean Charter School will investigate all reports filed in accordance with this policy. Matters reported internally without initial resolution will be investigated by the Director, Board Executive Committee, or their designee to determine if the allegations are true, whether the issue is material and what actions, if any, are necessary to correct the problem. The Director of Ocean Charter School will issue a full report of all matters raised under this policy to the Board of Trustees. The Board of Trustees may conduct a further investigation upon receiving the report from the Director.

For matters reported directly to the Board Executive Committee, the Board shall promptly acknowledge receipt of the complaint to the complainant if the identity of the complainant is known, conduct an investigation to determine if the allegations are true and whether the issue is material, and if determinable what, if any, corrective action is necessary. Upon the conclusion of this investigation, the Board of Directors shall promptly report its findings to all pertinent parties. For those matters reported to the Fraud Hotline, an independent examiner will evaluate the information given and contact Ocean Charter School's Director where a course of action will be determined.

Authority of Investigative Parties

The Investigative Parties (Director and/or Board of Trustees) shall have full authority to investigate concerns raised in accordance with this policy and may retain outside legal counsel, accountants, private investigators, or any other resource that is necessary to conduct a full and complete investigation of the allegations.

No Retaliation

This Whistleblower Policy is intended to encourage and enable employees to raise serious concerns within the organization for investigation and appropriate action. With this goal in mind, no employee who, in good faith, reports a concern shall be threatened, discriminated against or otherwise subject to retaliation or suffer adverse employment consequences as a result of such report. An employee who retaliates against a reporter acting in good faith is subject to discipline up to and including suspension without pay or termination of employment.

Acting in Good Faith

Anyone reporting a concern must act in good faith and have reasonable grounds for believing the matter raised is a serious violation of law or policy or a material accounting or auditing. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, with gross negligence, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in discipline, up to and including suspension without pay or termination of employment. Depending on the circumstances, such conduct may give rise to other actions, including civil or criminal lawsuits as determined by the Board of Trustees or any other individual who may have a private cause of action against the reporter.

Confidentiality

Reports of concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible. However, consistent with the need to conduct an adequate investigation, Ocean Charter School cannot guarantee complete confidentiality. Disclosure of information related to an investigation under this policy by staff, directors, or others involved with the investigation of Ocean Charter School to individuals not involved in the investigation will be viewed as a serious disciplinary offense and, with respect to Ocean Charter School employees, may result in discipline, up to and including suspension without pay or termination of employment. Depending on the circumstances, such conduct may also give rise to other actions, including civil or criminal lawsuits.