

Harlem Academy Whistleblower Policy

(Adopted by the Board of Trustees on October 10, 2012)

Harlem Academy (the "School") requires trustees, employees, contractors, interns and other volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. Employees and other representatives of the School must practice honesty and integrity in fulfilling their responsibilities and must comply with all applicable federal, state and local laws and regulations.

This policy is intended to encourage and enable each trustee, employee, contractor, intern and other volunteer ("Covered Persons") of the School to report concerns about fraudulent or illegal activities involving the School's financial or other affairs or other violations of the School's policies.

1. Reporting Procedure; Basis of Report. Concerns may be reported to the Head of School or the Finance Director or the Chair of the Audit Committee of the Board of Trustees, by telephone, mail, e-mail, or in person. Contact information for these individuals may be obtained from any of them or from the school's website, www.harlemacademy.org. The Covered Person submitting a report will be notified of receipt of the report. Concerns may be reported anonymously; however, since there will be no identified Covered Person to contact for further information about the report, anonymous reports must contain as detailed information as to the time, date, and nature of the reported activity and no acknowledgement will be provided. A Covered Person reporting a concern must act in good faith and have reasonable grounds for believing that the information provided in the report indicates that a fraud, violation of law or a School policy has occurred. Reporting a concern that proves to have been made maliciously, recklessly, or with the knowledge that the allegations are false will be viewed as a serious disciplinary offense and may result in disciplinary actions, up to and including termination of employment or dismissal.
2. Investigating Reported Information. Reports will be promptly investigated by, or under the direction of, the Audit Committee of the Board of Trustees. In connection with such investigation, all persons entitled to protection shall provide the Audit Committee or its designated investigator(s) with credible information related to the report. The Audit Committee has the authority to retain outside legal counsel, accountants, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations. Appropriate corrective action will be recommended to the Board of Trustees, if warranted by the investigation.
3. Confidentiality. All submissions, inquiries and discussions will be kept confidential, to the extent possible, consistent with the need to conduct an adequate investigation. In addition, confidentiality may not be maintained where identification is required by law. Disclosure of reports of concerns to individuals not involved in the investigation will be viewed as a serious disciplinary offense.
4. Protection from Retaliation. No Covered Person who reports a concern or cooperates in an investigation in accordance with this Policy shall be subject to retaliation by the School because of such report. Retaliation includes discharge, demotion, suspension, threats, harassment, or any adverse employment action. If any person submitting a complaint feels they have been subject to retaliation, they should report it immediately to the Head of School, the Finance Director or the Chair of the Audit Committee of the Board of Trustees. Any trustee, employee, intern and other volunteer who retaliates against a Covered Person who has reported a concern in accordance with this Policy or who, in good faith, has cooperated in the investigation of a reported concern is subject to discipline, including termination of employment or volunteer status.