

The Circle School Whistleblower Policy

It is the policy and intent of The Circle School to observe high standards of ethics, and to comply with all applicable laws and regulations. This policy is intended to encourage and enable employees, staff, students, volunteers, and trustees to raise concerns so that the school can address and correct inappropriate conduct and actions.

Enabling and encouraging people to come forward with concerns, The Circle School is structured democratically, adheres to principles of rule of law and due process, and protects employees, staff, students, and others from retaliation. The Circle School's democratic and non-hierarchical governance system, with no principal or chief executive, makes all staff members and students collectively responsible, through the School Meeting, for the school's operating policies, practices, and executive decisions. In particular, election of school officials and democratic decision-making help to empower and encourage individuals to assume personal responsibility for the school by raising concerns and proposals for improvement. It is our aspiration that all employees, staff, students, volunteers, and trustees will feel entitled and safe raising concerns. In particular, every School Meeting member is entitled and encouraged, at any weekly session of School Meeting, to bring specific proposals for policy or executive action, or general topics of concern for discussion.

If any person reasonably believes that some policy, practice, or activity of The Circle School is unlawful, unsafe, or unethical, the person is encouraged to submit a written report to the School Meeting Chair, Legal Affairs Officer, President of the Board of Trustees, any school staff member, or any trustee. The school's public website lists the names of trustees, and includes a contact form for communicating directly with the Board President (<http://circleschool.org/contact/board-of-trustees/>).

All written reports of alleged unlawful, unsafe, or unethical policy, practice, or activity shall be forwarded to the Compliance Officer, who shall investigate, initiate corrective action if warranted, and advise School Meeting and/or the Board President.

School Meeting's Legal Affairs Officer shall generally be the Compliance Officer. If allegations in a particular report involve the Legal Affairs Officer or would otherwise create a conflict of interests for that person, or if School Meeting or the Board President find other cause, then School Meeting or the Board President shall designate another Compliance Officer for that particular report.

Reports will be kept confidential to the extent possible, consistent with the need to conduct an investigation, and consistent with the school's collective governance.

The Circle School will not retaliate against an employee, staff member, student, or trustee who, in good faith, has made a report against some policy, practice, or activity of The Circle School, based on a reasonable belief that the policy, practice, or activity is unlawful, unsafe, or unethical.

Any person concerned that The Circle School has taken any retaliatory action in violation of this policy may submit a written complaint with both the President of the Board of Trustees and also the Legal Affairs Officer of the School Meeting. The Circle School Board of Trustees shall then promptly investigate the concern. If the Board finds retaliation in violation of this policy did occur, then the Board shall take prompt, effective, and appropriate corrective action to remedy any such violation and prevent recurrence in the future. If the Board finds no retaliation, it shall provide a report to the complainant of the reasons for any adverse action and the findings of the Board's investigation.