

**POLICIES PERTAINING TO OUR EMPLOYEES****EMPLOYEE COMPLAINTS, CONCERNS & GRIEVANCES****Employee Complaints, Concerns & Grievances:**

Except for sexual harassment, complaints where the supervisor is the subject of the complaint, all employees shall first bring their work-related complaints or concerns in writing to the Academy Director or immediate supervisor within 15 days of the day the employee knew of or should have known of the complaint. The Academy Director or supervisor shall hold a conference within fifteen business days and respond to the complaint within fifteen business days after the conference. Complaints or concerns which are not resolved at this level or within the required time may be brought to the attention of the Superintendent's designee within fifteen business days of the day of the level one response deadline. The complaint or concern addressed to the Superintendent's designee must be in writing, must be specific, and where possible, suggest a resolution. The Superintendent's designee shall hold a conference within fifteen business days of receipt of the written complaint and shall attempt to respond to all written complaints or concerns within fifteen business days of the conference. [Level I Complaint]

If the Superintendent's designee's resolution is not accepted, the complaint may appeal to Level II, which will be addressed by the Superintendent.

Employees who are dissatisfied with the response of the Superintendent may request to place the matter on the agenda of the next regularly scheduled Student Alternatives Program, Inc. (SAPI) Board of Directors meeting. The request must be in writing and must be filed within seven business days of following receipt of a response from the Superintendent, or if no response, within seven business days of the response deadline. The request shall be directed to the President of the Board of Directors, shall include a copy of the written complaint to the Superintendent, and the Superintendent's response. A copy of the complaint shall also be delivered to the Superintendent. Any action of the Board of Directors regarding the complaint shall be taken in compliance with the Open Meetings Act. The Board will consider the complaint and take whatever action it deems appropriate, including not responding or taking any action. A lack of response by the Board upholds the Superintendent's decision at level two.

**Anonymous Reporting Hotline.**

To ensure that each district complies with applicable law and rule and to safeguard its funds, property and other resources, the Board hereby establishes the Anonymous Reporting Hotline to provide employees an opportunity to report a suspected violation of a legal requirement, Board policy or administrative procedure or other impropriety. In consultation with legal counsel, the Board shall procure the services of a third-party contractor to establish, maintain and monitor the hotline.

The Board Chair and Superintendent shall notify all school employees via correspondence of the hotline. Additionally, the Superintendent shall ensure that a notice publishing the hotline is prominently displayed in the corporate office, each district's central office and campus offices. Moreover, the corporate and each district's website will include a web page publishing the hotline. The correspondence, notices and websites may include the following information.

The Board of Directors and Superintendent of the charter districts operated by Student Alternatives Program, Inc. are committed to the ethical and lawful operation of each charter district and the use of public funds, public property and other resources. To this end and to provide employees and other individuals with a venue by which to express their concerns, the Board of Directors and Superintendent have established the Anonymous Reporting Hotline to provide for the anonymous and confidential reporting of suspected fraud, financial impropriety and other unlawful, unethical or otherwise unauthorized or prohibited conduct. To report suspected fraud, financial impropriety or other unlawful, unethical or otherwise unauthorized or prohibited conduct, employees and other individuals should use the following methods of reporting a concern.

Call the Anonymous Reporting Hotline at (844) 990-0002. Calls can be made 24 hours a day, seven days a week. This telephone line is operated by LIGHTHOUSE SERVICES, Inc., an independent, third-party hotline services provider. No school employees have access to this telephone line.

Submit a report to the Anonymous Reporting Hotline through the Hotline website at <http://www.lighthouse-services.com/sapicsc>. This website is maintained and monitored by LIGHTHOUSE SERVICES, Inc., an independent, third-party hotline services provider. No school employees have access to this website.

E-mail the Anonymous Reporting Hotline at [reports@lighthouse-services.com](mailto:reports@lighthouse-services.com). This email address is maintained and monitored by LIGHTHOUSE SERVICES, Inc., an independent, third party hotline services provider. No school employees have access to this *email address*.

Fax the Anonymous Reporting Hotline at (215) 689-3885. This fax machine is located within the office of LIGHTHOUSE SERVICES, Inc., an independent, third-party hotline services provider. No school employees have access to this fax line.

Send a letter to the Anonymous Reporting Hotline at LIGHTHOUSE SERVICES, Inc., Anonymous Reporting Hotline, 1710 Walton Road, Suite 2014, Blue Bell, PA, USA 19422. This mailing address is maintained and monitored by LIGHTHOUSE SERVICES, Inc., an independent, third-party hotline services provider. No school employees have access to this mailing address.

For more information on the Anonymous Reporting Hotline, visit our web page at <https://www.lighthouse-services.com/triumphpublicschools>.

## **Investigation**

The anonymous reporting hotline service provider shall be instructed to refer any complaint received to the Board's designee(s) and legal counsel. In consultation with legal counsel, the Board's designee(s) shall promptly establish if the report is regarding waste, abuse, or fraud or if another investigatory process or legal requirements are triggered. Such reports will be channeled to the Board Chair by legal counsel and the Board's designee(s). In consultation with legal counsel, the Board Chair and the Board's designee(s) shall promptly investigate reports of a suspected violation of a legal requirement, Board policy or administrative procedure or other impropriety. As deemed appropriate and necessary, the Board may procure the services of a qualified professional to conduct the investigation. If an investigation substantiates the anonymous allegation, the Board's designee(s) or the contracted professional, in coordination and collaboration with legal counsel, shall promptly inform the Board of the report, the investigation, and any responsive action taken or recommended by the administration. All employees involved in an investigation shall be advised to keep information about the investigation confidential.

If in consultation with legal counsel, the Board's designee(s) establishes that the complaint is not regarding waste, abuse, or fraud or otherwise of a nature where the Board should continue to supervise the investigation based on advice from legal counsel, the Board's designee will be instructed to address such complaint administratively and in consultation with and through the Superintendent. Certain complaints (such as Title IX, Title VII, ADA/504, SPED) may be referred to other processes and to coordinators as outlined in policy or procedure (including Employee Handbook).

## **Whistleblower Grievances:**

Employees shall not suffer any adverse personnel action for having reported, in good faith, a violation of law or policy to an authority in a regulating, enforcing, investigating, or prosecuting branch of state or local government. Employees who believe that an adverse personnel action was taken in violation of this policy shall take immediate steps to have that action reviewed under the school grievance or employee complaint process. The School shall post a notice in a prominent place in the workplace as prescribed by the Attorney General advising employees of their Whistleblower rights.

**Date Adopted: November 4, 2000**  
**Last Date Amended: August 16, 2014**  
**Updated Amended: May 18, 2019**

**3 of 3**