

STEM SCHOOL HIGHLANDS RANCH POLICY  
Complaint and Whistleblower

I. PURPOSE

STEM School Highlands Ranch (STEM) requires STEM School Board members, employees, contract laborers, consultants, students, parents and guardians (jointly referred to in this Policy as "parents") to observe high standards of professional and personal ethics in the conduct of their duties and responsibilities. All STEM School Board members, employees, contract laborers, consultants, students, and parents must comply with all STEM policies, applicable laws and ordinances, regulatory requirements and Douglas County School District (referred to in this policy as "DCSD") policies applicable to charter schools, except to the extent that STEM has obtained waivers from state law and DCSD policies in accordance with STEM charter contract.

It is STEM's policy to promptly investigate any complaint about STEM as appropriate to the nature of the information in the complaint. This Complaint and Whistleblower Policy is intended to encourage and enable persons to raise serious concerns within STEM prior to seeking resolution outside of STEM.

II. POLICY

Definitions

General Complaints are those related to STEM incidents, teachers, safety, activities, curriculum, programs, etc. that may or may not constitute STEM policy violations, but that are NOT suspected to have violated a federal or Colorado law or a regulatory obligation of STEM.

Whistleblower Complaints are those alleging a violation of a federal law, Colorado law or a regulatory obligation of STEM.

Feedback, Questions, Suggestions, and General Complaints

STEM is committed to welcoming, encouraging and supporting parents as key partners in the education of our students. We value Parents' ideas, opinions and concerns, knowing Parents understand how issues and events affect their students and families.

Parents and students should share their feedback, questions and suggestions regarding STEM and its operations with the correct person who can answer their questions and receive their feedback. STEM's Communications Pathways document provides guidance for how to provide feedback, obtain answers to questions, provide suggestions and make General Complaints. STEM's General Complaint process is intended to provide parties an opportunity to express and resolve grievances at the lowest level possible. The General Complaint process provides neutral facilitation and mediation, with the goal of resolution, restitution, and relationship repair. If students or parents have General Complaints that involve classroom teachers, they are strongly encouraged to contact the teacher directly to resolve such matters informally whenever possible. The "Complaints" section of STEM's Student/Parent Handbook outlines the reporting

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and escalation procedure for General Complaints. In all complaint instances, an appropriate STEM representative will communicate the outcome to the person raising the complaint. When a complaint alleges a STEM policy violation, the outcome will be communicated in writing to the person raising the complaint.

### Whistleblower Complaints

STEM fosters an "open door policy" and encourages parents, students, employees, STEM Board members and community members to share complaints regarding STEM and its operations with someone who can address them properly. Whistleblower Complaints are investigated or overseen by the STEM Compliance Officer. This policy outlines investigation and reporting responsibility in certain instances. The "Complaints" section of STEM School's Student/Parent Handbook outlines the reporting procedure for Whistleblower Complaints. Unsatisfactory resolution persisting after appeal to the STEM Executive Director shall be taken up with the STEM Board via a written notice of appeal to the STEM Board. If resolution of a Whistleblower Complaint remains unsatisfactory after appeal to the STEM School Board, the complaint may be escalated to the Douglas County School District Board of Education.

### No Retaliation

No person, including a STEM employee, who in good faith reports a complaint shall suffer retaliation, intimidation, harassment (including cyber-bullying), or other adverse action (including adverse academic action). No STEM student shall suffer retaliation, intimidation, harassment (including cyber-bullying), or other adverse action (including adverse academic action). for their parents' good faith complaint or report of violation of STEM policy, law or regulatory requirement.

A STEM employee, student, or Board committee member who retaliates against someone who has reported a complaint in good faith is subject to discipline up to and including termination of employment, expulsion of student or removal from the STEM Board. A STEM volunteer, PTO member, SAC member or other person administering STEM-sanctioned activities who retaliates against someone who has reported a complaint in good faith is subject to serious disciplinary consequences.

### STEM School Risk and Compliance Officer

The STEM Compliance Officer is responsible for conducting or directing the investigation and resolution of allegations concerning violations of STEM policies, law or regulatory requirement. Reports of any illegal or unethical conduct should be made directly to the STEM Compliance Officer. The below table describes investigation responsibility and resolution reporting requirements for certain allegation sources and involved parties.

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<b>Source of Reported Complaint</b>	<b>Subject of Complaint</b>	<b>Investigation Point of Contact</b>	<b>Resolution Reporting</b>
Any	Faculty, Administration	STEM Compliance Officer	Executive Director, STEM Board Compliance Committee Chair
Any	Executive Director, STEM Compliance Officer	STEM Board Compliance Committee Chair, External Counsel	STEM Board of Directors, DCSD Director of Choice Programming
Any	STEM Board of Directors	STEM Compliance Officer or External Counsel	DCSD Director of Choice Programming
STEM Compliance Officer, STEM Board Member, DCSD	Any	STEM Board Compliance Committee Chair or External Counsel	STEM Board of Directors, DCSD Director of Choice Programming

The STEM Compliance Officer is responsible for reporting to the STEM Board of Directors the status and resolution of compliance matters on no less than a quarterly basis. This report will include the number of investigations into whistleblower Complaints currently open and number of investigations closed since prior report and other matters deemed appropriate.

**Accounting and Auditing Matters**

The STEM Compliance Officer shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing and shall immediately notify the STEM Board Compliance Committee Chair of any such complaint and work with the STEM Board Compliance Committee until the matter is resolved.

**Requirement of Good Faith**

Anyone filing a complaint concerning a suspected violation of any STEM policy, law or regulatory requirements must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious offense.

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### Confidentiality and Anonymous Whistleblower Complaints

Whistleblower Complaints must be submitted to the STEM Compliance Officer in writing via email ([compliance@stemk12.org](mailto:compliance@stemk12.org)) or US Postal Service. Whistleblower Complaints may be submitted on a confidential basis or may be submitted anonymously. To make an anonymous Whistleblower Complaint, mail complaint details in an envelope marked "Confidential" addressed to: Attn: Compliance Officer, STEM School Highlands Ranch, 8773 S. Ridgeline Blvd, Highlands Ranch, CO 80129. Complaints should include as much evidence as possible to corroborate the allegation(s) such as documents, witnesses, and other specific and relevant information.

Details of Whistleblower Complaints will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation and to comply with law.

### Handling of Complaints

The STEM Compliance Officer, or the person responsible for carrying out the Compliance Officer's role with respect to a reported violation, will acknowledge receipt of Whistleblower Complaints in writing to the person making the complaint within five business days (email is acceptable). All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation. When deemed appropriate by the STEM Board, STEM Compliance Officer will collaborate with DCSD regarding the conduct of investigations into whistleblower Complaints.

STEM shall keep DCSD apprised of interim and remedial measures taken in response to complaints forwarded to STEM by DCSD by notification to the DCSD Choice Programming Office. STEM shall notify DCSD of the resolution of the complaint within thirty (30) business days of resolution by notification to DCSD Choice Programming Office.

### Posting of Policy

This policy must be prominently displayed on the STEM website and promoted to students and parents through email annually and contained in the STEM registration packet for all students.

Approved by the STEM School Board on 10/01/2023 .  
(dd/mm/yyyy)

STEM School Highlands Ranch

By: Michelle Horne (*signature on file*)  
(Signature, Board secretary)

Michelle Horne  
(Printed name, Board secretary)

Adopted: September 2019

Revised: January 2023