Riverwalk Academy
Whistleblower Protection Policy

Adopted by the Riverwalk Academy Board: September 15, 2026

Riverwalk Academy intends to create and maintain an environment that protects the health and safety of students, staff members, and the school community, and that preserves and protects public funds and public resources from dishonesty, misuse, or loss. In addition, Riverwalk Academy intends to comply with all applicable federal, state, and local laws and regulations and all Board policies and school procedures.

I. State Whistleblower Protections

This policy establishes the rights, responsibilities, and protections afforded to any school staff member who reports, consistent with this policy, wrongdoing by the school or a school staff member.

Definitions

For purposes of this section of the policy, the following terms shall have the meaning set forth herein:

- Report - A written or oral allegation of waste or wrongdoing that should contain the following information, as practicable: the date of disclosure, the name of the school staff member making the report, the nature of the alleged wrongdoing, and the date or range of dates on which the wrongdoing allegedly occurred.
- Whistleblower - A Riverwalk Academy staff member who reports wrongdoing by the school or a school staff member.
- Wrongdoing - Action by Riverwalk Academy that results in substantial abuse, misuse, destruction, or loss of substantial public funds or public resources. This definition also includes an allegation that a Riverwalk Academy staff member has intentionally violated federal or state statutory law or regulations or other political subdivision ordinances or regulations, or a code of ethics, and such violation is not merely technical or of a minimum nature.

Procedures

A school staff member aware of wrongdoing, as defined herein, has a responsibility to submit a report to the Riverwalk Academy Board. To be afforded the protections set forth in this policy, the staff member submitting the report must identify himself/herself by name. The report must be submitted to the Riverwalk Academy Board within 180 days of the date the reporting staff member first learned of the alleged wrongdoing.

All reports of wrongdoing will be referred to an ad hoc committee. The committee will review and investigate, or refer to the appropriate authority for investigation, all reports of alleged wrongdoing. Upon a finding of wrongdoing, the committee will notify appropriate school officials so that corrective actions can be implemented.

The ad hoc committee will notify the Board as a whole and school leadership upon determination of wrongdoing and will provide them reports on the status or results of investigations. The appropriate school official shall report on the corrective actions taken to address any findings of wrongdoing, as appropriate.

Confidentiality

To the extent possible, the whistleblower's identity will be protected. However, a whistleblower's identity may need to be disclosed to comply with the law, to conduct a thorough investigation, or to provide fair procedural review for individuals accused of wrongdoing.

A person who is accused of retaliation, reprisal, interference, threats, coercion, or intimidation shall be given all due process rights in any disciplinary action that may result, pursuant to applicable federal and state law and regulations and Board policies and procedures.

Protection from Retaliation

Riverwalk Academy shall take reasonable steps to protect a whistleblower acting in good faith from retaliation.

Any whistleblower who believes he or she has been subject to retaliation as a result of filing a report of wrongdoing should contact the Riverwalk Academy Board Chair.

Anyone who retaliates against a person who, in good faith, reports wrongdoing in accordance with this policy will be subject to appropriate disciplinary action, up to and including removal from school staff.

Whistleblower Responsibilities

The whistleblower must exercise sound judgment to avoid making baseless allegations. A school staff member who files a report of wrongdoing that is unfounded, or amounts to a mere technical violation, and is not made in good faith may be subject to disciplinary action, up to and including removal from school staff.

II. Federal Whistleblower Protections

This policy satisfies the federal whistleblower notice requirement, which protects employees from retaliation for reporting misuse or mismanagement of federal funds or other violations of law.

Scope

In accordance with the federal whistleblower protections, Riverwalk Academy staff members are specifically protected from retaliation for reporting information they reasonably believe evidences:

- a violation of law, rule, or regulation related to a US Department of Education (ED) department contract or grant;
- gross mismanagement of an ED contract or grant;
- a gross waste of ED funds;
- an abuse of authority related to an ED contract or grant; or
- a substantial and specific danger to public health or safety.

Staff members who make such reports are protected from retaliation under federal law. Below please see internal and external methods of reporting, including to a member of Congress, or a representative of a committee of Congress; an Inspector General; the Government Accountability Office; a Federal employee responsible for contract or grant oversight or management at the relevant agency; an authorized official of the U.S. Department of Justice or other law enforcement agency; a court or grand jury; or a management official or other employee of the contractor, subcontractor, grantee, or subgrantee who has the responsibility to investigate, discover, or address misconduct.

Further, in accordance with the Federal False Claims Act, the Federal Enhancement of Contractor Employee Whistleblower Protections, and other applicable laws and regulations, Riverwalk Academy prohibits retaliation against any individual or whistleblower who in good faith reports suspected or actual noncompliance, as described herein, to the appropriate governmental authorities, regulatory bodies, law enforcement, licensing bodies, or other outside entities. Riverwalk Academy also prohibits retaliation against any individual who participates in any compliance-related investigations.

Internal Reporting

Individuals may report in good faith to the Riverwalk Academy Head of School or Board of Directors any suspected misuse of federal funds, gross mismanagement, or violations of law or regulation connected to Riverwalk Academy operations. Reports should include enough information to allow for a fair and thorough investigation, such as dates, individuals involved, and a description of the conduct or concern. Riverwalk Academy shall keep the individual's identity confidential to the extent possible; however, to thoroughly investigate a report of retaliation, Riverwalk Academy may need to reveal the identity of the reporting individual. For example, Riverwalk Academy may be legally required to report retaliation to appropriate entities, including disclosing the identity of the individual who reported. All reports, whether submitted internally or externally, will be treated with confidentiality to the fullest extent possible. Riverwalk Academy will not disclose the reporter's identity in connection with a protected disclosure unless required by law or essential to an investigation, consistent with federal law.

In addition to remedies provided under federal law, if an investigation determines that an individual has been the subject of retaliation, Riverwalk Academy shall take all necessary steps to make the individual

whole, which may include reinstatement, compensation or other remedies. Further, Riverwalk Academy will take appropriate disciplinary action against any Riverwalk Academy staff member found to have participated in the retaliation against the reporting individual. Once the investigation is complete, the individual who filed the report will be notified that the review has been completed and, where appropriate, that corrective action has been taken. Riverwalk Academy staff members who experience retaliation in violation of this policy may also pursue relief through applicable state or federal whistleblower protections.

External Reporting

Staff members and other covered individuals also have the right to report concerns directly to the appropriate federal oversight agencies. Reports involving the misuse or mismanagement of federal grant or contract funds may be submitted directly to the U.S. Department of Education Office of Inspector General, or to the Inspector General of any other federal agency providing the funds. Such reports may be made in addition to, or instead of, internal reporting through Riverwalk Academy channels.

Employment Expectations

This policy is not a contract of employment and does not create any rights or expectations regarding employment with or at Riverwalk Academy.

Review and Communication

Riverwalk Academy will communicate this policy and the associated whistleblower protections to all employees and stakeholders through training sessions and this policy will be posted on the Riverwalk Academy website.

Legal References:

United States Code of Laws, as amended:
- Whistleblower Protections (2 C.F.R. § 200.217)
- Federal False Claims Act (31 U.S.C. § 3730(h)).
- Enhancement of Contractor Employee Whistleblower Protections (41 U.S.C. § 4712).

S.C. Code of Laws, as amended:
- Whistleblower Act, Section 8-27-10, *et. seq*.