

IRONDALE BANDS

Compliance and Ethics Reporting (“Whistleblower”) Policy

Irondale Band Programs (“IBP”)¹ requires contracted staff, participants, and volunteers (including those through Irondale Band Boosters) to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of IBP, we must practice honesty and integrity in fulfilling our responsibilities and comply with applicable laws, regulations and the policies of the IBP as well as those of the Mounds View Public Schools (“MVPS”) and Irondale High School (“IHS”).

Reporting Responsibility

It is the duty of all staff, participants, and volunteers to immediately report any credible knowledge of any real or potential violation of any IBP, IHS, or MVPS policy or any applicable law or regulation in accordance with this Whistleblower Policy.

Reporting Violations

Reports of real or potential violations of any IBP, MVPS, or IHS policy or of any applicable law or rule shall be reported in good faith to the Band Director or any other competent individual included, but not limited to, a staff member, student leader, or Irondale Band Booster Executive Committee member. Persons receiving such reports are required to promptly forward the report to the Band Director, or Irondale Band Booster Executive Committee member, as appropriate.

If a person is not satisfied or uncomfortable reporting to the individuals listed above they can report to IHS Administration, Director of Student Activities, or other appropriate individuals.

Investigation

Upon receiving any reports of actual or suspected violations as described above, appropriate action shall be taken to protect the health, welfare and rights of the reporting parties, witnesses, and any other individuals involved. The nature of the complaint, the identity of the

¹ The IBP is a co-curricular activity of Irondale High School, New Brighton, MN (“IHS”) and the Mounds View Public Schools Minnesota District 621 (“MVPS”) and is led by the Irondale Director of Bands (“Band Director”). IBP includes the Irondale Marching Knights, Irondale Drumline, Irondale Winter Guard, and a variety of curricular and other co- or extra-curricular musical ensembles.

To clarify, the Irondale High School Band Boosters, Inc. (“IBB”) is a separate 501-c-3 non-profit organization, whose membership consists of the parents and guardians of students participating in one or more programs of IBP, as well as the Irondale Band Director who is ex-officio a member of the IBB Executive Board. Per the Constitution and ByLaws, the purpose of the IBB is to provide support to IBP in terms of fundraising and volunteer efforts and DOES NOT have any governance, supervisory, or any other control over IBP or the Irondale Band Director. Nevertheless, at the Band Director’s discretion, the IBB Executive Board does provide advice and counsel on a variety of matters including budget, policy, and event planning.

reporting party, and any other individuals involved shall be kept confidential to the maximum degree possible, though information may be disclosed to additional parties (e.g the Band Director, MVPS or IHS staff, law enforcement, etc.) necessary to facilitate a proper investigation. That said, the identity of the reporter will be kept confidential from the accused to the extent possible.

The investigation will be conducted in accordance with MVPS and IHS policies and procedures, including any and all measures deemed appropriate to investigate any reported violation of law or policies of IBP, MVPS, or IHS. This may include interviews with the individuals involved and witnesses to any conduct as well as review of written and electronic communications. Should a complaint be substantiated, disciplinary action will be made in accordance with IHS and MVPS policies and procedures, up to and including including termination of the individual's relationship with IBP, as well as any mandatory reporting of the incident(s) to appropriate civil or law enforcement officials, as may be required by applicable laws.

No Retaliation

It is contrary to the values of IBP for anyone to retaliate against anyone who in good faith reports a violation of any IBP policy or any applicable law or rule. Anyone who retaliates against someone who has reported a violation in good faith or someone involved in the investigation is subject to discipline, including, but not limited to, immediate suspension, termination of contracts, termination of employment (staff), restriction of activity within IBP (at the discretion of the Band Director), financial penalties, or removal from any/all IBP programs or activities. Any person dismissed for retaliation will not receive any refund of membership fees or other payments made to IBP up to the point of dismissal.

A decision whether any person associated with IBP has violated these policies will be determined at the discretion of MVPS.

False Reporting

False reporting will not be tolerated. Should it be determined after appropriate investigation that an allegation was brought based upon revenge, anger, dislike or any other improper motive, the individual or individuals making the false report are subject to immediate disciplinary action as set forth above, at the discretion of MVPS.

Costs and Indemnity of Civil Actions

Staff and Participants agree to indemnify and hold harmless IBP, MVPS, IHS, its officers, board members, employees, other staff, other members, and volunteers of and from any and all claims, demands, losses, causes of action, damage, lawsuits, judgments, including attorneys' fees and costs, as well as any other costs associated with defending such an action arising out of or relating to the breach or violation of this or the IBP, MVPS, IHS Policy on Protection from Harassment and Discrimination by any person.

Acknowledgement of Receipt

Participants acknowledge the receipt of this policy by signing and returning the IBP Commitment Contract for their activity. Should any questions arise, clarification and/or interpretation can be provided by the Band Director.