



JUDAH  
— BIBLE COLLEGE —

# WHISTLEBLOWER PROTECTION POLICY

## FROM THE EXECUTIVE DIRECTOR

### Why We Need This Policy

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This document is JBC's commitment to creating a culture where speaking up is safe, where wrong can be addressed before it becomes catastrophic, and where the integrity of this school is protected by the courage of every person in it. If you ever see something that needs to be said, **we want to hear it.**

Read this policy carefully. Use it when you need to. And know that no person who raises a good-faith concern under this policy will ever be retaliated against by Judah Bible College — not by me, not by anyone in leadership, not by any process under our control.

**Pastor Adam Aziz**

*Executive Director, Judah Bible College*

## WHO THIS POLICY PROTECTS

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This policy applies to and protects every person connected to Judah Bible College, regardless of role, tenure, or status. Specifically:

- **Students** — currently enrolled, on leave of absence, or recently graduated.
- **Faculty** — full-time, part-time, adjunct, and guest instructors.
- **Staff** — administrative, operational, and support personnel of any classification.
- **Volunteers** — any person providing service to JBC without compensation.
- **Contractors & vendors** — any third party providing services to JBC under contract.
- **Applicants** — prospective students or employees in the application or interview stage.
- **Family members & friends** — of any of the above, who may have observed or learned of a reportable concern through their connection.
- **Members of the public** — who in good faith report a concern about JBC operations or personnel.

This policy applies regardless of who the report concerns. The protection is **the same** whether the person being reported is:

- A peer student or employee.
- A faculty member or instructor.
- A staff member or administrator.
- The Executive Director.
- The Chancellor or Vice Chancellor.
- Any leader of Metro Tab Church acting in connection with JBC.
- A donor, partner, or external party connected to JBC.

There is no leadership level at Judah Bible College that is exempt from accountability through this policy.

## WHAT CONCERNS SHOULD BE REPORTED

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This policy covers a broad range of concerns...

### CONCERNS THAT BELONG UNDER THIS POLICY

- **Financial misconduct** — theft, embezzlement, fraud, misuse of JBC funds, unauthorized use of institutional resources, kickbacks, conflicts of interest, or any improper financial dealings.
- **Violation of accreditation standards** — any practice or policy that violates the standards of Transworld Accrediting Commission International or any other accrediting body to which JBC is subject.
- **Discrimination or harassment** — based on race, color, national origin, age, disability, or any other protected category. This is a backstop to JBC's direct anti-discrimination procedures and should also be reported through this channel if direct reporting feels unsafe.
- **Safety hazards** — any conditions or practices that pose an unreasonable risk of harm to students, employees, or others connected to JBC operations or facilities.
- **Conflicts of interest involving leadership** — undisclosed financial relationships, related-party transactions, or personal benefits derived from JBC decisions or resources.
- **Retaliation against another whistleblower** — any action taken against a person for raising a concern under this policy is itself a violation of this policy and must be reported.
- **Pattern of Code of Conduct violations** — by leadership, faculty, or staff that have not been adequately addressed through normal disciplinary processes.

## HOW TO REPORT A CONCERN

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JBC provides multiple reporting channels so that every person has a safe path forward, regardless of who the concern involves. Use whichever channel feels most appropriate to the situation.

### PRIMARY REPORTING CHANNELS

CONTACT	WHEN TO USE
<b>Executive Director</b>	For most concerns. Pastor Adam Aziz, admin@judahbiblecollege.org or (423) 894-3377.
<b>Chancellor</b>	For concerns involving the Executive Director, or when the reporter prefers to bypass the ED. Contact Dr. Steve Ball: through Metro Tab Church office.

### HOW TO SUBMIT A REPORT

Reports may be submitted in any of the following formats:

- **Written letter** — mailed to Judah Bible College, in care of the appropriate official, at PO Box 23527, Chattanooga, TN 37422. Marking the envelope “CONFIDENTIAL” will route it directly to the addressee.
- **Email** — sent to the appropriate official’s email address. Use a personal email address (not your JBC student or employee email) if you have any concern about email confidentiality.
- **In-person meeting** — requested by phone or email. Meetings can be conducted in person at Metro Tab Church or by video call for online students.
- **Phone call** — call the JBC office at (423) 894-3377 and request a confidential conversation with the appropriate official.

### WHAT TO INCLUDE IN YOUR REPORT

To enable a proper investigation, please include as much of the following as you are able to provide:

1. A clear description of the concern — what happened, what is happening, or what you have observed.

2. The name(s) of the person(s) involved (if known).
3. When the conduct occurred or began, and whether it is ongoing.
4. Where the conduct occurred (if applicable).
5. Names of any witnesses or other persons who may have knowledge of the matter.
6. Any supporting documentation you can provide (emails, documents, photographs, etc.).
7. Whether you have already discussed the concern with anyone, and if so, with whom.
8. Your name and contact information (or, if filing anonymously, see Section 6).

Initial reports may be made verbally, but you will be asked to follow up with a written summary unless filing anonymously. Written reports allow JBC to track, investigate, and respond to your concern with the seriousness it deserves.

## THE ANTI-RETALIATION PROMISE

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**Judah Bible College will not retaliate — and will not permit retaliation — against any person who in good faith raises a concern under this Whistleblower Protection Policy.**

This protection applies regardless of whether the concern is ultimately substantiated, and regardless of who the concern is about.

### WHAT COUNTS AS RETALIATION

Retaliation includes any adverse action taken against a person because they raised a concern, participated in an investigation, supported another person's concern, or refused to participate in conduct they reasonably believed was wrong. Specifically, retaliation includes:

- **For students:** lowered grades, denial of academic opportunities, denial of recommendation letters, exclusion from leadership opportunities, harassment by faculty or staff, social isolation orchestrated by leadership, expulsion or threats of expulsion, denial of graduation, denial of transcripts, or any other adverse academic action that would not have occurred but for the report.
- **For faculty and staff:** termination, demotion, reduction of hours, reduction of compensation, denial of promotion, transfer to less desirable assignments, exclusion from professional development, negative performance evaluations not warranted by actual performance, harassment by leadership or peers, or any other adverse employment action that would not have occurred but for the report.
- **For all persons:** threats, intimidation, public criticism, social shunning organized or condoned by leadership, attempts to discredit the reporter's character or testimony, or any informal pressure intended to punish the reporter or deter future reports.

### RETALIATION IS ITSELF A VIOLATION

Any person who retaliates against a good-faith reporter is **themselves in violation** of JBC policy and the JBC Code of Conduct. Retaliation is treated as a serious offense, separate from and additional to whatever underlying concern was originally reported. Retaliators are subject to discipline up to and including dismissal from JBC, regardless of their role or seniority.

## **IF YOU EXPERIENCE RETALIATION**

If you believe you are experiencing retaliation for a report you made under this policy, report the retaliation immediately through the same channels described in Section 4. If the retaliation involves the original recipient of your report, escalate to the next level (Chancellor). If you have already exhausted internal channels, you have the right to file an external complaint.

## **WHY THIS MATTERS**

In ministry contexts, retaliation often takes spiritualized forms — “You’re sowing discord”, “You’re not honoring authority”, “You need to forgive and move on”, “God is testing your loyalty.” These accusations are sometimes legitimate, but they have also been used for decades to silence people raising legitimate concerns. JBC’s position: **a person raising a good-faith concern is not sowing discord. They are pursuing the integrity of the institution.** That deserves protection, not punishment.

## CONFIDENTIALITY & ANONYMOUS REPORTS

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### WHAT JBC WILL DO TO PROTECT CONFIDENTIALITY

- Limit disclosure of your identity and the details of your report to those individuals with a legitimate need to know in order to investigate and resolve the matter.
- Store written reports in secure files separate from regular personnel and student records.
- Train all individuals involved in investigations on the importance of confidentiality.
- Discipline any person who breaches confidentiality protections without legitimate cause.
- Communicate with you directly about any anticipated disclosures of your identity before they occur, where reasonably possible.

### WHAT JBC CANNOT PROMISE

Complete anonymity is sometimes impossible, even when you request it. This is the honest truth of how investigations work:

- *If your concern is specific to interactions only you witnessed* — the subject of the report may be able to deduce your identity even if your name is never disclosed.
- *If your concern requires testimony in a formal proceeding* — due process rights of the accused person may require disclosure of your identity at some stage.
- *If your concern involves criminal conduct that requires reporting to law enforcement* — your identity may need to be shared with appropriate authorities.
- *If a court orders disclosure* — JBC will comply with lawful court orders. We will notify you in advance where possible and lawful.

JBC will be honest with you upfront about the likelihood that confidentiality can be fully maintained for your specific concern. If anonymity is essential to your willingness to report, raise that question with the official receiving your report at the very beginning.

### ANONYMOUS REPORTS

JBC accepts anonymous reports. However, anonymous reports are inherently more limited because:

- JBC cannot follow up to clarify or expand on the report.

- JBC cannot notify you of the outcome of the investigation.
- JBC cannot protect you against retaliation, because we don't know who you are.
- Investigations of anonymous reports may be limited by the availability of corroborating evidence.

If you wish to file anonymously, you may do so by submitting a written report by mail to the Office of the Executive Director, marked "CONFIDENTIAL," without including your name. JBC will investigate to the extent the information provided allows. We strongly encourage named reports because the anti-retaliation protections of this policy are most effective when JBC knows who needs to be protected.

## INVESTIGATION PROCESS

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Every report received under this policy is taken seriously. The investigation process is designed to be fair to the reporter, fair to the person being reported, and oriented toward truth-finding rather than institutional self-protection.

### INITIAL RESPONSE

Within **3 business days** of receiving a report, the official receiving the report will:

- Acknowledge receipt of the report in writing (where the reporter is identified).
- Conduct an initial assessment to determine whether the concern falls under this policy, requires immediate emergency action, or should be redirected to a different process.
- Notify the reporter of the initial determination and next steps.
- In cases involving the official receiving the report, hand the matter off to the next escalation level immediately.

### INVESTIGATION TIMELINE

Investigations are completed within **60 calendar days** of the report being received, absent extenuating circumstances. If the investigation cannot be completed within that timeframe, the reporter (where identified) and the subject of the report are notified in writing of the delay and the expected completion date.

### INVESTIGATION PROCEDURES

The investigation typically includes some or all of the following steps:

- Detailed interview with the reporter (if identified).
- Interview with the person who is the subject of the report, including notice of the allegations and an opportunity to respond.
- Interviews with any witnesses identified by either party or by the investigator.
- Review of relevant documents, communications, financial records, or other evidence.
- Consultation with outside professionals (legal counsel, certified public accountants, forensic specialists, etc.) where the nature of the concern requires it.

## **DETERMINATION**

At the conclusion of the investigation, the investigator will issue a written determination that includes:

- A summary of the allegations.
- A summary of the evidence gathered.
- Findings of fact based on the preponderance of the evidence.
- A determination of whether the concern was substantiated, partially substantiated, or not substantiated.
- Recommended actions in response to the findings (where applicable).

## **COMMUNICATION OF OUTCOME**

The reporter (where identified) will receive written notification of the conclusion of the investigation. Due to confidentiality and privacy considerations, the notification may not include all details of the findings or any disciplinary action taken against another person. The notification will, however, confirm that the report was investigated and indicate, in general terms, whether the concern was substantiated.

## GOOD-FAITH REPORTING & FALSE REPORTS

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This policy operates on a fundamental principle: **good-faith reports are protected; bad-faith reports are not**. Both halves of that statement matter.

### WHAT “GOOD FAITH” MEANS

A report is filed in good faith when the reporter:

- *Genuinely believes* the concern they are raising is true or substantially true based on what they have observed or learned.
- *Has reasonable grounds* for that belief — some basis in observation, conversation, document, or other evidence, even if their understanding turns out to be incomplete or mistaken.
- *Is not motivated* primarily by personal vendetta, retaliation against the subject, desire to harm the institution, or other improper purpose.

A report can be made in good faith and still turn out to be unsubstantiated. The investigator may find that the reporter misunderstood what they observed, that there is an innocent explanation, or that the evidence is insufficient to confirm the allegation. **None of those outcomes mean the report was filed in bad faith**. Good-faith reporters whose concerns are not substantiated remain fully protected by this policy.

### FALSE REPORTS FILED IN BAD FAITH

A report is filed in bad faith when the reporter:

- *Knows the report is false* or makes the allegation with reckless disregard for whether it is true.
- *Files the report primarily to harm the subject*, retaliate against them, gain personal advantage, or damage the institution.
- *Fabricates evidence* or knowingly presents misleading information to the investigator.

Bad-faith reports are themselves violations of the JBC Code of Conduct and may result in discipline up to and including dismissal from JBC. They harm the people falsely accused, they damage the institution, and they make it harder for genuine concerns to be heard. JBC takes false reporting seriously.