



Excellence in Adult Education Since 1985

Memo

To: DC PCSB

From: Brian McNamee, COO

CC:

Date: October 7, 2019

Subject: Policies for School Transparency Act

Below are policies found in AoH's Personnel Policies that are required for compliance to the School Transparency Act. The fulfilled transparency act requirement is listed in parenthesis.

- Equal Opportunity and Anti-Harassment (Sexual Harassment, Procedure for Complainant and Equal Opportunity)
- Whistleblower Policy (Whistle Blower Policy)
- Substance Abuse Policy (Drug Free Workplace)

All policies were approved by AoH's Board of Directors on September 28, 2019

Equal Opportunity and Anti-Harassment

Academy of Hope's policy is to offer Equal Employment Opportunity to all its applicants and employees. Employment decisions shall be based on merit, qualifications, and competence. Employment decisions shall not be based on race, color, religion, national origin, sex, pregnancy, childbirth or related medical conditions, genetic information of the employee or family member of the employee, age, disability, marital status, veteran status, or any other basis prohibited by federal, state or local law. This policy governs all aspects of employment including recruitment, training, compensation, benefits, transfers, reduction in staff, rehires, leaves of absences, promotion, discharge, and other terms and conditions of employment.

Academy of Hope specifically prohibits harassment and discrimination of applicants and employees on the basis of race, color, religion, national origin, sex, pregnancy, childbirth or related medical conditions, genetic information of the applicant/employee or family member of the applicant/employee, age, disability, marital status, veteran status, or any other basis prohibited by federal, state or local law, including sexual harassment (all as defined and protected by applicable law).

1. Sexual Harassment

Sexual harassment can occur between individuals of the opposite sex or the same sex. Sexual harassment may include, but is not limited to: intentional physical conduct that is sexual in nature, such as touching, pinching, and patting; sexually oriented gestures, noises, remarks, jokes, or comments about a person's sexuality or sexual experience; repeated unwelcome requests for a romantic relationship; and displaying pictures, posters, calendars, graffiti, objects, promotional materials, reading materials or other materials that are sexually suggestive, sexually demeaning or pornographic. Basing an employment, volunteer or educational decision or implying that a decision will be based on another person's submission to or rejection of sexual overtures is prohibited.

2. Harassment Other than Sexual Harassment

Harassment on other grounds, including race, color, religion, national origin, pregnancy, childbirth or related medical conditions, age, genetic information of the employee or family member of the employee, disability, marital status, veteran status, or any other basis prohibited by federal, state or local law is also prohibited. Prohibited harassment may include, but is not limited to, epithets, slurs, derogatory comments or jokes, intimidation, negative stereotyping, threats, assault or any physical interference with the employee's normal work or movement, and other conduct that the individual might reasonably find to be offensive and which is directed at an individual employee, his/her relatives, friends or associates. Harassment may also include written or graphic material placed on walls, e-mail, bulletin boards or elsewhere on Academy of Hope's premises, or circulated in the workplace that denigrates, shows hostility or aversion towards an individual or group because of the characteristics identified above.

3. Procedure for Complaints

If any employee, volunteer or student of Academy of Hope believes conduct that violates this policy has occurred, or if any of these persons has questions concerning this policy, he or she should contact the HR Generalist or their supervisor immediately.

Individuals are encouraged to report potential harassment before it becomes severe or pervasive. Reports will be investigated impartially, and any warranted corrective action will be taken, including discipline for inappropriate conduct. Complaints will be handled confidentially, except as necessary for investigation and resolution. This policy prohibits retaliation, harassment, or other adverse action because of making a complaint, assisting in an investigation, opposing harassment or otherwise exercising employment rights protected by law.

Whistleblower Policy

1. General

A whistleblower as defined by this policy is an employee of Academy of Hope who reports an activity that he/she considers to be illegal or dishonest. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measure; the Chief Executive Officer and, when appropriate, the Chair of the Board of Directors are charged with these responsibilities. It is the intent of Academy of Hope to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization's goal of legal compliance.

2. No Retaliation

No employee or volunteer who in good faith reports a violation shall suffer harassment, retaliation, or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment. The Whistleblower Policy is intended to encourage and enable employees and volunteers to raise serious concerns within the Academy of Hope prior to seeking resolution of the issue externally.

3. Reporting Violations

In most cases, an employee's supervisor is in the best position to address an area of concern. The supervisor will then report the violation to the Chief Executive Officer, or in matters involving the Chief Executive Officer, the Chair of the Board of Directors. If you are uncomfortable speaking with your supervisor or you are not satisfied with your supervisor's responses, you are encouraged to speak directly with the Chief Executive Officer or the Chair of the Board of Directors.

4. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Reports of violations or suspected violations will be kept confidential to the extent possible, subject to the need to conduct an adequate investigation.

5. Investigation and Follow-Up Actions

For reports not made anonymously, The Chief Executive Officer--or in matters involving the Chief Executive Officer, the Chair of the Board of Directors--will notify the complainant and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Substance Abuse Policy

AoH maintains a drug-free workplace and intends that AoH personnel be a drug-free workforce. Employees and volunteers may not use, possess, manufacture, distribute, dispense, transport, sell, or be under the influence of or be impaired by illegal drugs or alcohol while on AoH's premises or while conducting any business-related activity at a client site or any other place away from AoH's premises. Such activities not only violate company rules, but also can jeopardize AoH and create situations that are unsafe or that substantially interfere with job performance. You may use legally prescribed drugs on the job only if they do not impair your ability to perform the essential functions of your job effectively and safely without endangering yourself or others. Employees or volunteers in violation of this policy are subject to appropriate disciplinary action, up to and including termination.