

# CAPITAL CITY PUBLIC CHARTER SCHOOL

## **PERSONNEL POLICIES**

Dear Colleagues:

We are pleased that you are a member of our staff, and we look forward to working with you to bring the best educational opportunities to the students served by Capital City Public Charter School.

To ensure that every Capital City employee is equipped with the tools and resources for outstanding performance, we have provided you with a copy of the school's Personnel Policies. These documents are a guide for both new and current employees. The Personnel Policies offer information on the employment policies and procedures that govern topics such as professional conduct and ethics, employee leave, work schedules, performance management, equal employment opportunity, and dispute resolution.

Capital City will also provide an Employee Resource Guide with more detailed information regarding day-to-day processes and procedures (such as requesting supplies, fieldwork protocols, evaluation procedures, etc.). The procedures and policies outlined in the Personnel Policies and the Employee Resource Guide apply to all staff. These Personnel Policies supersede all previously issued Personnel Policies and any inconsistent verbal or written policy statements made or issued before these Personnel Policies.

It is the expectation that Capital City employees will read these documents and follow the policies and procedures outlined in them. I invite you to raise questions or concerns about these policies with me or with our Chief Operating Officer. Policies and procedures will continue to be refined and developed in response to identified needs and feedback. One of the major benefits of being a public charter school is that we can respond to the needs of our school community by adjusting policies and procedures at anytime. The input of the group makes our school stronger. Any revisions, deletions, or additions to Capital City's policies must be in writing. No oral statements or representations can change the provisions of Capital City's Personnel Policies or Employee Resource Guide.

Thank you for your ongoing cooperation and support.

Sincerely,

Karen Dresden  
Founder and Head of School

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# SECTION I: ABOUT CAPITAL CITY PUBLIC CHARTER SCHOOL

## SCHOOL MISSION

Capital City enables a diverse group of students to meet high expectations; develop creativity, critical thinking, and problem-solving skills; achieve deep understanding of complex subjects; and acquire a love of learning along with a strong sense of community and character. We will graduate young adults who are self-directed, intellectually engaged, and possess a commitment to personal and civic responsibility.

## FOREWORD

Whether you are a new or current employee, we are confident that you will find Capital City a dynamic and rewarding place to work. We look forward to a productive and successful association. These personnel policies, in combination with the Employee Handbook, are intended to serve as a guide for the employer-employee relationship. This Personnel Policies document provides general legal guidelines for the employer-employee relationship, while the Employee Handbook provides more specific procedures for the day-to-day execution of duties and access to school resources.

You should read, understand, and follow the policies and procedures in this document as well as the employee handbook. If you have questions about the Personnel Policies, please consult the Business and Human Resources Manager or your supervisor first. Unresolved questions can be addressed to the Chief Operating Officer or the Head of School.

There are several things that are important to keep in mind about these policies:

1. These Personnel Policies are only general information and guidelines. They are not intended to be comprehensive or to address all the possible applications of, or exceptions to, the general policies and procedures described. For that reason, if you have any questions concerning eligibility for a particular benefit, or the applicability of a policy or practice to you, you should address your specific questions to your supervisor or the Business and Human Resources Manager.
2. Neither the Personnel Policies nor the Employee Handbook confers any contractual obligations or rights, either express or implied. No information contained in these documents shall be construed to create any legal rights, duties or obligations. No policy set forth in this document guarantees any continuity of employment, benefits, or rights. The procedures, practices, policies, and benefits described in these Personnel Policies and the Employee Handbook may be modified or discontinued at any time in Capital City's sole

discretion. In no event shall Capital City incur any liability as a result of any modification or discontinuation of procedures, practices, policies and/or benefits.

3. Nothing in this Handbook is intended to limit any concerted activities by employees relating to their wages, hours or working conditions, or any other conduct protected by Section 7 of the National Labor Relations Act.
4. Furthermore, nothing in this Handbook prohibits an employee from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to or participating in an investigation or hearing conducted by the Equal Employment Opportunity Commission (“EEOC”), National Labor Relations Board (“NLRB”), Securities and Exchange Commission (“SEC”) or any other federal, state or local agency charged with the enforcement of any laws.
5. No representative of Capital City, except the Head of School or her/his designee, has the authority to modify any policies, procedures, or benefits outlined in the personnel policies.
6. Some of the benefits described are covered in detail in official policy documents. You should refer to these documents for specific information, since the Personnel Policies only provide a summary.
7. In the event of a conflict between any policy, procedure, or benefit described here and any applicable law or benefit plan document, the applicable law or plan document will prevail.

## SECTION II: EMPLOYMENT AT CAPITAL CITY

### EMPLOYMENT CATEGORIES

#### Classifications

Exempt employees are employees whose job assignments meet specific tests established by the federal Fair Labor Standards Act (FLSA) and state law and are, therefore, exempt from minimum wage and overtime pay requirements. Exempt employees are compensated on a salary basis, and may work additional hours in the course of performing their duties, but are not entitled to additional pay. All teachers are exempt employees.

Non-exempt employees are employees whose job positions do not meet FLSA or applicable state exemption tests, and who are NOT exempt from minimum wage and overtime pay requirements. Nonexempt employees are eligible to receive overtime pay for hours worked in excess of 40 hours in a given week, or as otherwise required by applicable state law, at an overtime rate of one and one-half times their hourly rate for those hours. For a more detailed description of overtime provisions, please see the section on Overtime Pay.

Whether a position is exempt or non-exempt will be specified in its offer letter or job description. Employees who are unsure can check with the Business and Human Resources Manager.

12-month employees work year-round, and receive benefits tied to that distinction.

10-month employees, usually teachers or other instructional staff, work only during the school year and receive benefits tied to that distinction. Salaried 10-month employees receive their salaries in equal increments spread over 12 months.

Full-time teachers are scheduled to work 38.5 hours per week, inclusive of a 30-minute daily lunch break. Other full-time employees are scheduled to work 35-40 hours per week, inclusive of a 30-minute daily lunch break. Full-time employees can be paid on an hourly or salaried basis and may be exempt or non-exempt.

Part-time employees are scheduled to work less than a full-time schedule. Part-time employees who work 20 hours per week or more are eligible for most employee benefits on a prorated basis, as described in the Benefits section. Part-time employees can be paid on an hourly or salaried basis and may be exempt or non-exempt.

Temporary employees are hired as interim replacements, to temporarily supplement the work force, or to assist in the completion of a specific project. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees retain that status unless and until notified of a change in writing. Temporary employees may be eligible for employee benefits based on the specific details of their position and offer of employment.

## AT-WILL EMPLOYMENT STATUS

Consistent with D.C. law, Capital City is an at-will employer. All employees at Capital City are employed “at will,” which means that employees enter into employment with Capital City voluntarily. Furthermore, employment may be terminated at any time, with or without cause, and without prior notice, by Capital City or by the employee. Neither the Personnel Policies nor any other Capital City document confers any contractual right to remain a Capital City employee.

This at-will employment policy is the sole and entire agreement between the employee and Capital City as to the duration of employment and the circumstances under which employment may be terminated. No manager or supervisor has any authority to enter into a contract of employment express or implied that changes or alters the at-will employment relationship.

## THE IMMIGRATION AND REFORM AND CONTROL ACT OF 1986 (I-9 REGULATION)

Under the Immigration Reform and Control Act of 1986, Capital City is required to employ only individuals who are authorized to work in the United States. As a condition of employment, employees must properly complete the first section of the Department of Homeland Security Form I-9 and provide Capital City with original documents that establish their identity and employment eligibility within three business days of commencing employment. Employees should consult the List of Acceptable Documents attached to the Form I-9 to determine which documents are sufficient to establish identity and employment authorization.

Completed Form I-9s shall be maintained for three (3) years after an employee's initial hiring or one (1) year after the date of termination of employment, whichever is later. If an employee previously worked for Capital City and is rehired, before commencing work they must complete the form and provide the necessary documentation if: (1) their previous Form I-9 is more than three years old, (2) the supporting documentation provided is no longer valid, or (3) their Form I-9 cannot be located.

If at any time an employee cannot verify their right to work in the United States, Capital City will be obligated to terminate their employment. Employees who cannot provide Capital City with appropriate documentation within three working days of their start date will not be permitted to work for Capital City until the documentation is presented.

## STAFF QUALIFICATIONS

All employees shall demonstrate a strong commitment to the mission, philosophy, and educational approach of the school and embrace the principles of the school's EL Education model through their interactions with students, parents, and co-workers.

Capital City has established specific qualifications for each position consistent with District of Columbia legal guidelines, and are listed in job descriptions and hiring guidelines. For more information on a particular position's requirements, employees should contact the Business & Human Resources Manager.

### Continuing Education

All employees are required to keep their professional training and knowledge current through ongoing professional development. Campus administrators (Principals, Directors of Student Services and Instructional Coaches) will work with instructional staff to develop personal professional development plans and to identify and arrange professional development activities that support these plans. Supervisors will work with non-instructional staff to support their ongoing professional development. Professional development activities might include attending workshops,

taking courses, observing in other classrooms and other schools, self-study, classroom research, and participation in professional organizations and conferences.

Capital City may fully or partially pay for or reimburse employees for coursework, seminars, or workshops related to professional development goals if permitted by the school's annual budget and aligned with school goals. Any such professional development must be approved in advance by a supervisor using procedures specified in the Employee Handbook. Employees are required to submit documentation of completed coursework and proof of attendance in order to qualify for reimbursement.

## RESPONSIBILITIES

### Performance of Duties

Employees are responsible for performing the duties outlined in their offer letter, job description or any other document which sets forth Capital City's expectations of a person holding the same or equivalent position.

Employees may be required to participate in duties unrelated to their assigned duties, including, but not limited to, monitoring students outside of the classroom or the school's facilities, assisting in the maintenance of the school and its resources, and coordinating extracurricular activities. Work may occasionally extend beyond scheduled working hours.

### TB Testing

Before the first day of employment, all new hires must have a tuberculosis test, and provide documentation of a negative (or managed non-active) result to Capital City. Test results will be maintained in a confidential electronic file by the Business & Human Resource Manager. Failure to timely provide proper documentation may result in postponement of start date or rescission of job offer. Employees must provide documentation of tuberculosis screening every three years before the first day of the school year.

### Background Checks

No employee is authorized to start work at Capital City until Capital City has completed all legally required background checks. Employees are expected to support this process fully.

A pending criminal matter may be considered in appropriate circumstances for business-related reasons, consistent with applicable law. All background checks will be conducted in strict conformity with the federal Fair Credit Reporting Act (FCRA), applicable state fair credit reporting laws, and state and federal anti-discrimination and privacy laws. Capital City is an equal

opportunity employer and will comply with applicable federal, state and local laws relating to the use of background checks for employment purposes.

## Mandated Reporter

All Capital City teachers and staff are designated as Mandated Reporters of child abuse and neglect. Before their start date and annually each school year, employees must complete the Mandated Reporter online training and submit proof of completion to the Business & Human Resources department.

## Kognito Training

All Capital City teachers and principals complete the Kognito behavioral health training once every two years. This training is comprised of three parts: At-Risk, Referral Process, and Suicide Postvention. Once these trainings are completed employees must submit proof of completion to the Business & Human Resources department.

## Work Schedules

Instructional employees are expected to arrive at work 15 minutes before the start of the school day and remain 15 minutes after the close of the school day unless otherwise specified in an offer letter or schedule provided by the Principal or Head of School. Additionally, instructional employees are required to attend professional development on Wednesdays until 4:15 p.m. Every effort will be made to provide all full-time instructional staff with a daily 30-minute duty-free lunch break. Instructional staff may be required to participate in activities directly related to their classroom duties, which may be held outside of the normal school day. These duties may include parent-teacher conferences, teacher in-service sessions conducted within the regular work hours, staff meetings, and information seminars for parents, prospective parents, or others.

Full-time, non-instructional staff are expected to work an eight-hour day, Monday through Friday, including a lunch break of 30 minutes. Work schedules will be discussed and agreed upon at the time of hire. Supervisors must approve any changes to scheduled hours.

Part-time staff will work the hours specified in their offer letter or approved by their supervisor.

All 10-month instructional staff are required to report to work two weeks before students begin school to attend a two-week summer institute in preparation for the coming school year. (10-month and 12-month instructional staff should avoid taking leave during this time period). All 10-month instructional staff must work until one day after students are dismissed from school, unless otherwise specified in writing. The latter day is generally allotted for campus staff to complete end-of-year responsibilities although there may be a required staff meeting on that day. 10-month employees must complete all of the required end-of-year responsibilities before departing for the summer, even if that means returning after the designated last workday. 10-month employees will be given a detailed checklist of responsibilities before the end of the school year.

10-month employees will not otherwise be required to work when school is not in session, with the exception of designated staff workdays (conference days, expedition planning days, professional development days, report-writing days, etc.). A calendar will be provided at the start of each school year. 12-month employees are not required to work on designated school holidays, but are required to work or take leave during winter, spring, and summer breaks unless these days are otherwise designated by the Head of School as 12-month employee holidays.

## ATTENDANCE, PUNCTUALITY, AND DEPENDABILITY

It is imperative that employees who work in an educational setting are not late to work. Dependability, demonstrated by regular and punctual attendance, is one of the most important assets an employee can provide to Capital City. Capital City relies upon its staff and teachers' dependability, attendance, punctuality, and commitment to do the job right. Capital City expects and requires its employees to come to work on time every day. Being "on time" means that employees are at their assigned place of work (office or classroom) and ready to begin work at the scheduled start time of the workday. Employees are expected and required to be at work on all scheduled workdays, during all scheduled work hours. If employees are tardy or do not come to work as scheduled, there are negative impacts to Capital City's operations.

If an employee will be absent for a foreseeable reason, they should obtain prior approval from the Principal or their supervisor before taking time off. Instructional employees who believe that they will be late for any reason or absent due to an unforeseeable reason, must call and speak with their Principal. Non-instructional employees must contact your supervisor following whatever procedures specified. An employee who is repeatedly late or has an excessive number of absences may be subject to discipline, up to and including termination. If an employee fails to report to work without notification to the Principal or his/her supervisor, Capital City may consider that employee has abandoned his/her employment and thus voluntarily terminated his/her employment. In such cases, Capital City will provide notice to the employee that his/her employment has been voluntarily terminated.

Employees who need to leave early must notify the Principal or their supervisor as soon as they learn that they will not be able to complete their scheduled shift. Capital City may inquire about the general reason for an absence, tardiness or early departure.

Capital City will not subject employees to disciplinary action or retaliation for an absence, tardiness or early departure for which discipline may not be imposed under applicable law. If the employee believes that their absence, tardiness or early departure is (or should be) excused pursuant to applicable law, the employee should notify their supervisor of this fact as soon as possible, but no later than at the time of the absence, tardiness or early departure. (For the required timing of an employee's notice of the need for a foreseeable leave of absence, see the applicable leave policy). If an employee believes they have been mistakenly subject to disciplinary action for an absence,

tardiness or early departure that the employee believes is or should be excused/approved, the employee should promptly discuss the matter with their supervisor or Human Resources. Capital City will investigate the situation and any errors will be corrected.

Upon returning to work after an absence for any reason, an employee must ensure that time off is accurately recorded on their timesheet. Employees that are absent for medical reasons for more than three (3) working days may be required to provide a physician's note.

## Timesheets

All employees must accurately record their working hours and time off in a timesheet. Capital City uses this information to report hours of work when required by law, regulations or other rules. Electronic timesheets provide supervisors and the Business and Human Resources Manager with the necessary information to make sure that non-exempt employees, especially employees who are paid on an hourly basis, get paid correctly and that leave is recorded accurately. If an employee fails to complete their timesheet, the time will be charged as personal leave; if personal leave has been exhausted, time will be recorded as leave without pay. All timesheets must be completed at the end of each pay period (the 15th and end of the month) for supervisor approval.

### *Nonexempt Employees*

Employees who are classified as nonexempt must accurately record the time they work each day, including arrival, departure and meal break times. Nonexempt employees must report all time worked and not work any time that is not authorized by their supervisors. This means nonexempt employees must not start work early, finish work late, work during a meal break, or perform any other extra or overtime work unless directed to do so. Employees who have questions about when or how many hours they are expected to work should contact their supervisor or Human Resources.

It is a violation of the Capital City's policy for anyone to instruct or encourage another employee to work "off the clock," to incorrectly report hours worked, or to alter another employee's time records. If any employee is directed or encouraged to incorrectly report hours worked, or to alter another employee's time records, he or she should report the incident immediately to a supervisor or Human Resources.

### *Exempt Employees*

Employees who are classified as exempt must record absences from work for reasons such as leaves of absence, sick leave or vacation. As set forth above, Exempt employees are paid on a salary basis. This means the employee regularly receives a predetermined amount of compensation each pay period, which cannot be reduced because of variations in the quality or quantity of the employee's work. In general, an exempt employee will receive his or her salary for

any week in which the employee performs any work, regardless of the number of days or hours worked.

However, an exempt employee will not be paid for days not worked in the following circumstances:

- When an exempt employee takes one or more full days off for personal reasons other than sickness or disability, the employee will not be paid for such day(s) of absence, but the employee may use available **paid time off (PTO)** to make up for the reduction in salary;
- When an exempt employee takes one or more full days off from work due to sickness or disability, the employee will not be paid for such day(s) of absence, but the employee may use available sick time to make up for the reduction in salary;
- When an exempt employee works only part of the week during his or her first and last week with Capital City, the employee will be paid only for the days actually worked; and
- When an exempt employee takes unpaid leave under the Family and Medical Leave Act or corresponding laws, Capital City will not pay for such days/hours of absence.

Capital City may require an exempt employee to use available vacation or sick time, as a replacement for salary, when the employee takes less than a full-day off from work.

An exempt employee's salary will not be reduced when the employee works part of a week and misses part of a week due to service as a juror, witness or in the military or for lack of work. It is company policy to comply with the salary basis requirements of the FLSA and applicable state law. Capital City prohibits any deductions from pay that violate the FLSA or applicable state law.

If an exempt employee believes that an improper deduction has been made to his or her salary, the employee should immediately report this information to Human Resources or a supervisor. Reports of improper deductions will be promptly investigated. If it is determined that an improper deduction has occurred, the employee will be promptly reimbursed for any improper deduction made.

## Inclement Weather Or Other Emergency Conditions

The procedures for notifying staff and students of school closings are specified in the Employee Handbook. 10-month employees are not expected to work when school is closed for inclement weather. 12-month employees should contact their supervisor to determine if they must report to work or if they can work from home or take unscheduled leave. Certain employees are considered essential in an emergency and will be aware of their requirement to report to work when school is closed for weather or emergency conditions.

## EMPLOYEE RECORDS

Capital City collects and maintains personal employee information required for business purposes. It is important that employee records are current, since this information is used for benefits

administration, notification in case of an emergency, and other administrative and reporting purposes. Employees should contact the Business and Human Resources Manager to report any of the following changes:

- legal name
- home address or telephone numbers
- emergency contact information
- marital status
- number of dependents
- designated insurance beneficiary
- military status
- number of W-4 exemptions
- certification status
- professional licenses or educational degrees

Employee records are the property of Capital City. Capital City will make every effort to keep employee records confidential and shall only provide access to employee records on a need to know basis and shall only provide access to employee records on a need to know basis. This does not, however, preclude Capital City from providing information to duly authorized governmental or law enforcement agencies or pursuant to a legally issued summons or judicial order, such as a subpoena or a search warrant.

## CONFIDENTIAL PERSONNEL FILE

Capital City shall maintain a confidential personnel file for each employee. The personnel file shall be maintained by the Business and Human Resources Manager and shall be accessible to only the employee, the employee's supervisor, the Business and Human Resources Manager, and other persons on a need-to-know basis. The personnel file will include information such as an employee's application for employment, resume, records of training, documentation of performance appraisals and salary increases, and other employment records.

If an employee wishes to review their personnel file they should schedule an appointment with the Business and Human Resources Manager. Employees are not permitted to remove, deface, or otherwise make notations on the documents in their personnel file. If an employee objects to, disagrees with or wishes to clarify information contained in their personnel file, the employee may submit a written statement that will be included in the personnel file. **Employees may not be allowed to view investigation records or any letters of reference that have been prepared or collected by management.** Under no circumstances are former employees permitted access to their personnel files.

Employee medical records, if any, are maintained separately and are not included in your personnel file. These records also will be treated confidentially and will be disclosed as required for the

purposes of administering Workers' Compensation, leaves of absence, other lawful purposes or as authorized in writing by the employee.

## SECTION III: WORKPLACE PRACTICES

### SMOKING POLICY

In accordance with applicable law, Capital City is smoke-free and offers a smoke-free environment to its students, employees, guests and visitors in all Capital City locations. This policy also applies to electronic cigarettes and any smokable substances. In addition, employees are not permitted to smoke within 50 feet of any Capital City building entrance or at off-site school sponsored events. No employee will be retaliated against for using tobacco products off of school grounds, and in accordance with this policy, on personal time.

### WORKPLACE VIOLENCE PREVENTION

Capital City is committed to maintaining a safe environment for students, families and employees, and, to that end, has adopted a zero-tolerance policy concerning workplace violence.

All employees, visitors, students and families, without exception, will be treated with courtesy and respect at all times. Workplace violence is any intentional conduct that is sufficiently severe, abusive or intimidating to cause an individual to reasonably fear for their personal safety or the safety of their family, friends and/or property such that employment conditions are altered or a hostile, abusive or intimidating work environment is created for one or several employees.

Employees are expected to refrain from fighting, "horseplay," or other conduct that may be dangerous to others. Firearms, weapons and other dangerous or hazardous devices or substances are prohibited from the premises of Capital City without proper authorization, regardless of whether you are licensed to carry the weapon or not. The only exception to this policy is for police officers or other individuals who have been given written permission to carry a weapon on Capital City premises.

Conduct that threatens, intimidates or coerces another employee, visitor, student, family, or a member of the public at any time, including off-duty periods, will not be tolerated. Examples of workplace violence include, but are not limited to:

- Threats or acts of violence occurring on Capital City premises, regardless of the relationship between the parties involved in the incident;
- Threats or acts of violence occurring off Capital City premises involving someone who is acting in the capacity of a representative of Capital City;

- Threats or acts of violence occurring off Capital City premises involving an employee if the threats or acts affect the business interests of the Capital City;
- All threats or acts of violence occurring off Capital City premises, of which an employee is a victim, if we determine that the incident may lead to an incident of violence on Capital City premises; and
- Threats or acts of violence resulting in the conviction of an employee or agent of Capital City or an individual performing services for Capital City on a contract or temporary basis, under any criminal code provision relating to violence or threats of violence when that act or the conviction adversely affect the legitimate business interests of Capital City;

Examples of conduct that may be considered threats or acts of violence under this policy include, but are not limited to:

- Threatening physical contact directed toward another individual;
- Threatening an individual or their family, friends, associates or property with harm;
- The intentional destruction or threat of destruction of Capital City's or another's property;
- Menacing or threatening phone calls;
- Stalking;
- Veiled threats of physical harm or similar intimidation; and/or
- Communicating an endorsement of the inappropriate use of firearms or weapons.

Workplace violence does not refer to workplace arguments or debates that are zealous or impassioned, provided there is no resort to any form of coercion. Discussions about sporting activities, popular entertainment or current events are not considered workplace violence when there is no threat of violence being directed to the workplace or any individual connected with it. Rather, workplace violence refers to behavior that demonstrates an intention to engage in violence, condones violence in our workplace, or targets any individual with acts or threats of violence.

Employees should help maintain a violence-free workplace. To that end, all threats of, or actual, violence, both direct and indirect, must be immediately reported to a Principal, the Chief Operating Officer, or the Head of School. This includes threats or acts by employees as well as by students, family, visitors, vendors, or other members of the public. When reporting a threat or act of violence, be as specific and detailed as possible. All suspicious individuals or activities must be reported as soon as possible to the Principal, the Chief Operating Officer or the Head of School.

Capital City will promptly and thoroughly investigate all reports of threats of or actual violence and of suspicious individuals or activities. The identity of the individual making the report will be protected as much as is practicable. In order to maintain safety and the integrity of its investigation, Capital City may place employees on leave, either with or without pay, pending investigation. Anyone determined to be responsible for threats of, or actual, violence or other conduct that is in violation of these guidelines will be subject to prompt disciplinary action up to and including termination of employment.

Capital City encourages employees to bring their disputes or differences with other employees to the attention of their Principal or supervisor before the situation escalates into potential violence. Capital City is eager to assist in the resolution of disputes and will not discipline you for raising good faith concerns.

This policy shall not be construed to create any duty or obligation on the part of Capital City to take any action beyond that required of an employer by existing law.

## DRESS CODE AND DECORUM

Employees are expected to model positive behavior for students at all times. Capital City believes that strong staff modeling is more important for ensuring positive student behavior than any written rules or policies.

We recognize that employees are quite active and engaged with students and that attire must be conducive to the work with students. There is no official dress code for staff and dress at Capital City is generally casual. Employees are expected to use their best judgment as to when more formal dress is warranted (i.e., special meetings, fieldwork, visitors, etc.), and should look neat, clean and well-groomed. It is important that employees follow the general guidelines that students are expected to follow with regards to dress. Specifically, shorts and skirts must be of appropriate length, undergarments must not be visible, pants should fit appropriately (not too tight, not falling down), shirts and blouses must offer appropriate coverage of chest and midriff. Additionally, clothing should be clean and without visible holes or tears.

## ELECTRONIC DEVICE USAGE

It is essential that employees be engaged and attentive to their duties while at work. Except in cases of emergency, employees should only make or accept personal calls, texts, or send or read personal emails or text messages during scheduled breaks. This applies to Facebook and other social networking sites as well. Use of cell phones and other electronic devices for personal reasons is only permitted during an employee's non-work hours (including breaks).

## SECTION IV: COMPENSATION AND PERFORMANCE MANAGEMENT

### SALARY

Capital City attempts to offer competitive salaries for all positions, but does not align its salary schedule with any other school or school system. Capital City has pay scales for teachers and support staff, which are evaluated each year and periodically adjusted. For non-teaching positions, salaries are determined based on a variety of factors including comparable salary information, job responsibilities, employee experience, and budget constraints. Capital City maintains market-derived wage and salary ranges for each position based on job title. Employees receive offer letters each spring specifying total compensation (e.g., salary, benefits, 403B contribution, etc.) for the upcoming school year. Employees should contact their supervisor, the Business & Human Resources Manager, or the Head of School with salary-related questions.

### OVERTIME

From time to time, Capital City may require employees to work more than forty (40) hours in a week. We understand personal time is important. As such, Capital City will endeavor to limit overtime work to activities which cannot otherwise be performed during regular work schedules and which if deferred might impair performance of a critical aspect of a task. Capital City will make every effort to provide advance notice of overtime requirements. Employees are expected to work overtime when operational demands require.

Nonexempt employees will be paid one and one-half (1.5) times their regular rate of pay for all hours worked in excess of 40 in one workweek and as otherwise required by applicable federal and District of Columbia law. Overtime pay is based on actual hours worked. Time off for sick leave or any leave of absence, holiday, vacation or other hours not worked, but paid, will not be considered hours worked for the purpose of computing overtime.

Any and all overtime performed by non-exempt employees must be pre-authorized by the employee's supervisor. If an employee has any questions as to whether they are required to perform overtime, they should confirm with their supervisor before engaging in overtime. Working overtime without prior authorization may result in disciplinary action.

## PERSONNEL EVALUATION

All employees will be reviewed annually. Supervisors are responsible for the evaluation of the employees who report directly to them. All job descriptions clearly state the direct supervisor for the position. The evaluation process is intended to support learning, reflection, and continuous improvement for all staff at Capital City. Specific information about the evaluation process will be provided at the beginning of the year, either in the Employee Handbook or other documents.

A positive performance review does not guarantee a salary increase or a promotion. These decisions are made at the discretion of Capital City and depend on a number of factors in addition to an employee's individual performance.

Capital City reserves the right to make any personnel changes (including termination) before or after performance evaluations.

## PAYMENT OF WAGES

Capital City employees are paid semi-monthly on the 15th and last of each month. If a scheduled payday falls on a holiday or weekend, payment will be made on the preceding workday. Any discrepancies regarding paychecks or earnings statements must be identified in writing to the Business & Human Resources Manager within five (5) business days of receipt of any paycheck or other compensation.

### Direct Deposit

Capital City encourages the use of direct deposit of funds to either a savings or checking account at your U.S. bank of choice (providing the bank has direct deposit capability). To activate direct deposit, employees should complete a Direct Deposit Authorization Form, which can be obtained from the Business & Human Resources Manager.

### Lost Paycheck

The Business Manager must be notified of a lost paycheck as soon as possible. The Business Manager will request a stop payment on the lost paycheck and issue a replacement check. The employee may be responsible for reimbursing Capital City for any fees associated with replacing a lost paycheck. Capital City encourages all employees to use direct deposit, which eliminates the possibility of lost paychecks.

### W-4s and State Withholding Certificates

The amount of federal, state and local withholding is affected by the number of exemptions an employee claims on Form W-4, Employee's Withholding Allowance Certificate, and appropriate

state withholding exemption certificates. If an employee's marital status changes or the number of exemptions previously claimed increases or decreases, a new Form W-4 must be completed and submitted to the Business & Human Resources Manager. If an employee changes their name, they should see the Business & Human Resources Manager to update appropriate forms. Employees may make changes to W-4s and/or state withholding at any time.

## Payroll Deductions

Capital City is required by law to deduct from paychecks items such as the Social Security tax and Medicare tax (collectively referred to as "FICA"), federal income tax, state and local income tax and any other required taxes. Other deductions may be made from paychecks if authorized in writing or if the law requires Capital City to do so for other purposes, such as liens, garnishments or court orders. Employees should contact the Business & Human Resources Manager with any questions regarding the deductions reflected on their pay stub.

## Reporting Errors and Obtaining More Information

If any employee, exempt or nonexempt, has questions about deductions from their pay, believes they have been subjected to improper deductions, or believes that the amount paid does not accurately reflect the employee's total hours worked or salary, please contact Human Resources, a supervisor or any other member of management.

Every report will be fully investigated, and Capital City will provide the employee with any compensation to which the employee is entitled in a timely fashion.

Capital City complies with all applicable laws, including the Fair Labor Standards Act, and will not allow any form of retaliation against individuals who make good faith reports of alleged violations of this policy, or who cooperate in an investigation by Capital City, even if the reports do not reveal any errors or wrongdoing.

## Discussion of Wages

No employee is prohibited from disclosing the amount of his or her wages or inquiring about or discussing the wages of other employees. Capital City will not retaliate against employees for disclosing their wages or inquiring about or discussing the wages of other employees.

This policy does not apply to the disclosure of other employees' wage information by human resources or other managers who have access to such information solely as part of their essential job functions and who, while acting on behalf of Capital City, make unauthorized disclosure of that information.

**This policy does not require disclosure of wages.**

## SECTION V: BENEFITS

Capital City has established a variety of employee benefit programs designed to assist employees and their eligible dependents in meeting the financial burdens that can result from illness and disability, and to help plan for retirement. The Personnel Policies contain only a very general description of the benefits to which an employee may be entitled and is not intended to, and does not, provide all the details of these benefits. Therefore, this document does not change or otherwise interpret the terms of the official plan documents. An employee's rights can be determined only by referring to the full text of the official plan documents, which are available from the Business & Human Resources Manager. To the extent that any of the information contained in this document is inconsistent with the official plan documents, the provisions of the official documents will govern in all cases.

Capital City reserves the right, in its sole and absolute discretion, to amend, modify or terminate, in whole or in part, any or all of the provisions of the benefit plans described herein. Further, Capital City reserves the exclusive right, power and authority, in its sole and absolute discretion, to administer, apply and interpret the benefit plans described herein, and to decide all matters arising in connection with the operation or administration of such plans.

Capital City complies with all applicable federal and state laws regarding the provision of benefits to same-sex spouses, domestic partners and couples in a civil union. Employees should contact Human Resources if they have any questions regarding benefits eligibility for themselves or their spouses, domestic partners or partners in a civil union.

For more information regarding any of our benefit programs, please refer to the Explanation of Benefits for the current school year, which are provided separately, or contact the Business & Human Resources Manager. Please contact the Business & Human Resources Manager for copies.

### HEALTH BENEFITS

Capital City offers health and dental insurance coverage for current full-time staff and part-time staff who work 20 hours or more per week.

Employees have up to thirty (30) days from their date of employment to select their medical and dental plans. Once the selection is made it will remain fixed for the remainder of the plan year; however, employees will have an opportunity to make changes to their benefit selections during Capital City's annual open enrollment period.

Employees who experience a qualifying life event such as marriage, divorce or the birth of a child will also be allowed to make a change in their benefit selection when that event occurs, in accordance with the terms of the Plan document.

Capital City contributes a portion of the premium, and the employee is responsible for paying the balance. The amount of the employee's contribution will depend on the coverage type and level selected by the employee. If an employee chooses to decline health benefits, the employee must sign the waiver form.

## RETIREMENT BENEFITS

Capital City will make the required employer contribution toward federal Social Security for all employees. All employees regularly working more than 20 hours per week, who are not temporary employees, are also offered a retirement plan under Section 403(b) of the Internal Revenue Code. Capital City presently automatically contributes 3% of the employee's salary to the 403(b) plan and matches any additional employee contribution on a one-to-one basis up to an additional 3% of the employee's salary. Employees hired on or after November 1, 2017 must work at least 1,000 hours for Capital City for three consecutive plan years before having a vested interest in the contributions of Capital City to the employee's 403(b) plan. Employees hired before November 1, 2017 must work at least 1,000 hours in two consecutive plan years before having a vested interest in the contributions of Capital City to the employee's 403(b) plan.

If notified by an employee that they qualify, Capital City contributes the amount required by DC to the DC Teacher Retirement Fund for employees on leave from the District of Columbia Public Schools System who elect to retain their existing retirement plan with the District of Columbia Public Schools System. Employees who do not wish to have retirement accounts opened for them must complete a waiver form.

## OTHER BENEFITS

Capital City may offer employees other benefits, which will be specified at the time the employee receives an offer.

## COBRA – CONTINUATION OF CERTAIN BENEFITS

The Consolidated Omnibus Budget Reconciliation Act (COBRA), as amended, gives certain former employees, retirees, spouses and dependents of current and former employees who are not eligible for benefits because of a qualifying event (such as termination of employment or reduction in hours) the right to temporary continuation of health insurance coverage. Currently, eligible individuals may be able to continue coverage for up to 18 months, or up to 36 months if certain

conditions apply. The employee and/or beneficiary who loses coverage will be responsible for paying 100% of the premium and an administrative charge, if any.

Information concerning COBRA will be mailed to new plan participants within 90 days of the effective date of their coverage under the group health plan. Following termination of health plan benefits because of a qualifying event, employees and their insured dependents will receive information by mail regarding COBRA options.

## WORKERS' COMPENSATION BENEFITS

Employees are automatically insured under the Workers' Compensation Act for injuries sustained in the course of employment. Capital City pays the entire cost of the Workers' Compensation insurance premium. This program covers most injuries or illnesses, sustained in the course of employment, that require medical, surgical, or hospital treatment. Subject to applicable legal requirements, Workers' Compensation insurance provides benefits or, if the employee is hospitalized, treatment immediately..

All employees must:

- Immediately report in writing ALL on-the-job injuries and job-related illnesses to their supervisor and/or the Business & Human Resources Manager, regardless of whether the injury/illness is minor or of little apparent significance.
- Submit any medical claims as instructed by the Workers' Compensation carrier. Claims for work-related injuries/illnesses should NOT be submitted to Capital City's group health insurance carrier.

Failure to report and document job-related injuries may result in disciplinary action. Reporting job-related injuries promptly protects both Capital City and the employee. Please contact the Business & Human Resources Manager for more information.

### Pay and Benefits During Workers' Compensation Absences

If an employee is deemed to qualify for Workers' Compensation benefits and is unable to work, they will be reassigned from "active" to "inactive" status. Wages for lost work time are covered exclusively by Workers' Compensation benefits in accordance with applicable law. In the District of Columbia, employees will not be paid lost wages by the Workers' Compensation carrier for the first three days of disability caused by a work-related illness or injury. Employees may use accrued sick leave or personal leave for the initial three days of absence relating to a work-related injury or illness.

Employees may be eligible to continue health and welfare benefits for themselves and their eligible dependents during an absence arising out of a work-related illness or injury under the same conditions as if they had continued to work, up to a maximum of 16 work weeks. Employees

would be responsible for any premiums or contributions required of an active employee (e.g., your share of health and dental insurance premiums), which will be billed by Capital City.

Because Workers' Compensation benefits are not wages, they are not eligible for 403(b) contributions. Contributions to Capital City's 403(b) plan are suspended during the period of Workers' Compensation leave. If an employee returns to work within 16 weeks of the onset of Workers' Compensation leave, they may be eligible to make up missed contributions in accordance with IRS limits. Employees should contact the Business & Human Resources Manager for further information on the impact of Workers' Compensation leave on 403(b) contributions and benefits.

Employees who need to take time off from work due to a workers' compensation illness or injury may also be eligible for a leave of absence under Capital City's leave or reasonable accommodation policies

## Return to Work

Capital City may reinstate employees who return from a Workers' Compensation absence to their same or an equivalent position with equivalent benefits, pay, and other terms and conditions of employment following an absence of 16 weeks or less. However, employees have no greater right to reinstatement or to other benefits and conditions of employment than if they had been working continuously.

Medical certification/authorization to return to work completed by the employee's physician must be submitted to the Business & Human Resources Manager before an employee is permitted to return from a Workers' Compensation absence. If the employee does not provide the required medical certification supporting their ability to perform their job duties, with or without a reasonable accommodation, the employee is not permitted to resume work.

If an employee returns to work with work restrictions or needs accommodations they must contact the Business & Human Resources Manager who will collaborate with the Principal, Head of School and/or their supervisor, to determine whether they can resume work duties. Capital City may require an employee to consult with a physician of Capital City's choice and at Capital City's expense in situations where work restrictions are indicated or additional medical advice is required.

## Fraud

Capital City will notify the workers' compensation insurance company if we have reason to believe an employee has supplied false or misleading information in connection with a claim and/or has filed a fraudulent claim. Workers' compensation fraud is a crime and may also be grounds for disciplinary action, up to and including termination of employment.

# SECTION VI: LEAVE AND TIME OFF

## GENERAL LEAVE PROVISIONS

Regular attendance is imperative for all employees, particularly those with direct responsibility for the education of students. Employees are encouraged to use their leave only when necessary and should make every effort to structure their leave in a manner that is least disruptive to students and co-workers. All employees shall inform the Principal or their supervisor of an anticipated absence in advance, or as soon as possible if the need for leave is unforeseeable, and such leave must be approved by the Principal or supervisor.

Capital City may require employees on leave to provide periodic reports during the leave regarding their status and intent to return to work. Employees are expected to return to work no later than the next regularly scheduled workday after the expiration of the approved leave. If an extension is desired, employees are required to submit a written request to their Principal or supervisor. The Principal or supervisor may require an employee to verify the claimed reason for any absence.

If an employee is on an approved leave of absence for which a health care certification is required, they may jeopardize their right to leave and/or their continued employment by engaging in activities that are incompatible with the health care certification submitted in support of the leave. Misrepresenting reasons for applying for or continuing a leave of absence may result in disciplinary action, up to and including termination.

Any exceptions to this policy must be reviewed in advance and approved by the Head of School.

## PAID HOLIDAYS

Full-time and part-time employees are eligible for paid holiday leave immediately upon employment. Employees are paid for scheduled holidays that occur during their employment period (either 10-months or 12-months), with part-time employees paid based upon their regular hours of work and work schedules. Temporary employees are not eligible for paid holidays.

Capital City will establish a school calendar before the beginning of each school year that identifies all paid holidays. Capital City generally observes the following scheduled holidays:

1. New Year's Day
2. Dr. Martin Luther King, Jr.'s Birthday
3. Presidents Day
4. Memorial Day
5. Independence Day

6. Labor Day
7. Indigenous Peoples Day
8. Thanksgiving Day
9. Day After Thanksgiving
10. Christmas Eve
11. Christmas Day

Other holidays (or days on which the building is closed and all staff are granted leave) may be designated by the Head of School. When a federal holiday falls on a Saturday or Sunday, the preceding Friday or the following Monday, respectively, will be observed as a substitute paid holiday, as indicated on the school calendar.

## SICK LEAVE

Full-time 12-month staff accrue sick leave at a rate of one day per month (12 days per year). 10-month staff shall accrue a total of 64 hours (or 8 days) of sick leave at the beginning of the school year. Principals or supervisors may advance sick leave not yet accrued up to the annual maximum that the employee may accrue under this policy.

Sick leave is available to employees to provide for full salary and benefits for absences due to the following reasons:

1. The employee's or eligible family member's physical or mental illness, injury or medical condition;
2. To obtain professional medical diagnosis or care or preventive medical care for the employee or eligible family member; or
3. If the employee or eligible family member is a victim of stalking, domestic violence or sexual abuse; provided that the absence is directly related to social or legal services pertaining to the stalking, domestic violence or sexual abuse for the purpose of:
  - (a) Seeking medical attention for the employee or the employee's family member to treat or recover from physical or psychological injury or disability caused by the stalking, domestic violence or sexual abuse;
  - (b) Obtaining services for the employee or the employee's family member from a victim services organization;
  - (c) Receiving psychological or other counseling services for the employee or the employee's family member;
  - (d) Temporarily or permanently relocating;
  - (e) Taking legal action, including preparing for or participating in any civil or criminal legal proceeding relating to the stalking, domestic violence or sexual abuse incident; or

- (f) Taking other actions that could be reasonably determined to enhance the physical, psychological or economic health or safety of the employee or the employee's family member or the safety of those who work or associate with the employee.
4. A contagious illness that would pose an unacceptable risk of illness to students or staff exposed through the employees normal duties.

Eligible family members include the employee's: children (including stepchildren and foster children), grandchildren, parents, parents-in-law, stepparents, spouses, spouses of children, domestic partners, siblings and brothers- and sisters-in-law. A person with whom the employee shares or has shared, for at least the 12 preceding months, a mutual residence and with whom the employee maintains a committed relationship is also an eligible family member under this policy, as is a child who lives with an employee and for whom the employee permanently assumes and discharges parental responsibility.

Sick leave is granted only for the reasons listed above unless otherwise required by law. Unused sick leave can be carried over in future years. Compensation for accrued and unused paid sick time is not provided upon separation from employment for any reason.

## Notifying the School When You Take Sick Leave

If known in advance (e.g., doctor appointments), sick leave should be requested through Capital City's time and attendance system and following any additional requirements requested by a Principal or supervisor. For day-of absences, employees are required to call or text their Principal or supervisor as soon as they know that they will be absent. The Principal or supervisor will provide staff with contact numbers. Employees should not leave a voicemail message on the school phone, which likely will not be received until after the school day begins. Instructional employees must also contact their co-teachers or other teacher who will be substituting to give plans for the day. Non-instructional staff should ensure that any responsibilities for the day are covered by a direct report, colleague or supervisor. Additionally, any meetings at which attendance is required should be rescheduled.

Upon return to work, employees must ensure that sick leave is correctly reported on their timesheet through the Capital City time and attendance system.

## Leave Certification

Capital City may require employees who are out on leave for three or more consecutive days and seeking compensation to provide reasonable documentation supporting their request for leave, such as:

- Signed document from a health care provider;

- Police report indicating that the employee or family member was a victim of stalking, domestic violence or sexual abuse;
- Court order indicating the employee or employee's family member was the victim of stalking, domestic violence or sexual abuse; or
- Signed statement from a victim and witness advocate or domestic violence counselor affirming that the employee is involved in a legal action relating to the stalking, domestic violence or sexual abuse or sought services related to the health or safety of the employee or employee's family member.

Employees must provide the certification immediately upon return to work or within one business day after returning.

Employees are prohibited from using paid sick and safe time for improper purposes. Capital City may require more frequent certification from employees if there is a pattern of abuse of paid leave suspected.

## PERSONAL LEAVE

Personal Leave applies to 10-month employees only. Full-time 10-month staff are permitted up to four days (or 32 hours) of leave per school year for urgent personal business or other emergencies. If eligible, part-time 10-month staff accrue a prorated amount of Personal Leave based on their FTE. These hours will accrue at the beginning of the school year. Please keep in mind that because instructional staff have paid time off during all school breaks, personal leave is not intended to be used as vacation. It is intended to cover "urgent personal business" that can only be taken care of when school is in session and that is not covered by Administrative Leave (discussed below).

Personal Leave must be approved in advance by your Principal or supervisor and may be denied. Personal Leave will generally not be approved on days immediately before or after a holiday or on professional development days. Unused Personal Leave will convert to sick leave at the end of the school year and be carried forward as sick leave.

Any Personal Leave accrued prior to June 30, 2012 may be retained and carried over until used. Leave taken in any given year will be deducted from recently accrued leave first.

## PERSONAL TIME OFF (PTO)

Full-time 12-month employees accrue 20 days of PTO per calendar year for vacation or other activities of their choice. PTO will accrue at a rate of 13.33 hours per month and may not be used without permission from the supervisor and the Head of School. Unused PTO up to 120 hours can be carried over into the next fiscal year, and up to 80 hours of accrued unused PTO will be paid out if not utilized prior to the end of employment.

Any PTO accrued prior to June 30, 2012 may be retained and carried over until used. Leave taken in any given year will be deducted from recently accrued leave first.

## ADMINISTRATIVE LEAVE

Administrative leave is granted to employees for absences due to the following personal matters:

1. Up to five work days for an appearance in court as a party to a case or pursuant to a subpoena as necessary to protect the rights of the employee.
2. Up to three work days following the death of an immediate family member.
3. Up to three days for religious observance as required by an employee's faith.
4. Attendance at professional development activities approved by the Principal or supervisor.

Leave should be requested from the supervisor and verification may be required in some circumstances.

## JURY DUTY

Capital City recognizes and respects employees' civic obligation to perform jury duty when summoned and grants employees leave for this purpose. If an employee must report for jury duty during regular work hours, time off with no loss of salary will be provided for up to two (2) weeks. Any employee, when advised of their notification of jury duty, must immediately inform their principal or supervisor. Whenever possible 10-month employees are strongly encouraged to request postponement of jury service to the summer. Capital City can provide a financial hardship letter for a jury summons greater than two weeks.

Any additional or other time off under this policy will be without pay, except that exempt employees will not incur any reduction in pay for a partial week's absence due to jury duty.

## MATERNITY/PATERNITY LEAVE

Capital City will provide eight (8) weeks of leave for all full-time employees who have been employed for at least 12 months at the time of the birth or adoption of a child or the acceptance of a foster child. The eight weeks run consecutively and begin upon the birth or adoption of a child, whether or not the leave is taken. If the time period immediately following the event does not include any work days per the employee's scheduled work year, Maternity/Paternity Leave does not apply. This leave cannot be deferred by any employee for use at a later time period.

The first two weeks of Maternity/Paternity Leave will be with full pay, and the next six weeks will be with half pay (indicated as Administrative Leave on the employee's timesheet). Any health benefits provided to the employee by Capital City will continue to be provided during this leave. Whenever

possible, such leave must be pre-approved by the Principal or supervisor with at least 30 days advance notice.

Full-time employees will receive full pay for any holidays that occur within the 8-week period, and holidays will count towards the 8 weeks of leave. For 10-month employees, if birth or adoption occurs immediately before a school break, the Maternity/Paternity Leave period occurs concurrently with the break and does not extend the 8-week period. Employees will not under any circumstances receive more than full pay and may not defer unused Maternity/Paternity Leave to a later time period.

Maternity/Paternity Leave is a paid leave benefit that Capital City chooses to offer its employees. The intent of the policy is to allow employees to remain at home during the first 8 weeks following birth or adoption. It is distinct from unpaid family and medical leave guaranteed to all employees under the federal Family and Medical Leave Act of 1993 ("federal FMLA") and the District of Columbia Family and Medical Leave Act ("DC FMLA"), and the provisions governing the use of this leave are established by Capital City and are distinct from federal and DC FMLA.

Any Maternity/Paternity Leave used by employees will be considered as a substitution of paid leave for unpaid leave and will be considered to run concurrently with the federal and DC FMLA entitlement to unpaid leave. It does not extend the total amount of leave available under federal and DC FMLA. Employees may be permitted to take additional weeks of unpaid leave if approved as part of a leave plan.

As soon as reasonably possible, the employee should inform their supervisor and the Business & Human Resources manager that they are expanding their family so that the Business & Human Resources Manager will provide the employee with information about the Protecting Pregnant Workers Fairness Act. Before the birth or adoption, the employee should meet with their supervisor and the Business & Human Resources Manager to discuss a leave plan. A leave plan should be drafted and submitted to the Principal or supervisor for approval that indicates the number of weeks of leave requested and the amount of accrued Sick Leave or PTO/Personal Leave that will be used.

Employees may use accrued Personal Leave or PTO to supplement Maternity/Paternity Leave to extend the amount of paid leave if available. Employees may use accrued Sick Leave during the first 8 weeks or at any other time that conditions for use of sick leave apply. Under certain conditions, an employee may return to work half-time, with the approval of their supervisor, and continue to receive half-time paid leave. Employees who wish to make arrangements for temporary part-time schedules should discuss this with their supervisor well in advance and should be aware that approval is dependent on the needs of the school.

It is understandable that a leave plan may need to be modified. Revised requests should be submitted to the Principal or supervisor and the Business & Human Resources Manager.

Examples of Maternity/Paternity Leave timelines:

Scenario 1: Birth or adoption occurs on a Sunday and is followed by two full weeks of school. Employee can be at home for two full weeks, receiving full pay. Two weeks of leave will be charged as Maternity/Paternity leave. The third through eighth weeks the employee is eligible to remain at home while receiving half pay, which may be augmented with available Sick Leave, Personal Leave or PTO. The employee will receive full pay for any scheduled holidays that occur during this time, but holidays will count towards the 8 weeks.

Scenario 2: A holiday or school break falls during the first two weeks following birth or adoption. This does not increase the eight weeks of Maternity/Paternity Leave or the two weeks during which the employee can be at home receiving full pay. Upon the third week, half-pay begins.

Scenario 3: Birth or adoption occurs in mid-summer for a 10-month employee. Employee does not miss any days of work, and does not use any leave, paid or unpaid. Employee continues to receive full pay and Maternity/Paternity Leave does not come into play. If the school year resumes within 8 weeks of the birth/adoption event, the employee may be entitled to some weeks of half-time pay.

Employees should consult with the Business & Human Resources Manager to learn more about how various leave programs interact.

## FAMILY AND MEDICAL LEAVE

Capital City recognizes that certain circumstances, such as personal illness, the illness of a family member, or the birth, adoption or placement for foster care of a child, may require an employee to be away from work for an extended period. It is Capital City's policy to comply with both the federal and DC FMLA). Any leave taken under this policy may count toward the leave entitlement under both laws and is unpaid. When both laws apply, the more generous leave period is applicable. Leave generally may be taken continuously, intermittently or on a reduced leave schedule.

This policy is intended to provide a descriptive summary of employees' rights and responsibilities. More detailed information about family and medical leave may be obtained by contacting the Business & Human Resources Manager.

### Employee Eligibility

To be eligible for DC FMLA an employee must have been employed by Capital City continuously for one year, without a break in service (except for regular holidays or for sick or personal leave

granted by Capital City) , and worked at least 1,000 hours in the 12-month period immediately before the date when the leave begins, in the District of Columbia.

To be eligible for federal FMLA an employee must have been employed by Capital City for at least 12 months, and worked at least 1,250 hours in the 12-month period immediately before the date when the leave begins.

## Length of Leave

Under the DC FMLA, employees are entitled to medical leave of up to sixteen 16 weeks in any 24-month period, and family leave of up to 16 weeks during any 24-month period. The 24-month period for determining leave is calculated on a “rolling” basis. For example, if an employee takes 16 weeks of medical leave beginning September 1 for their own serious health condition, they generally would not be able to take additional DC FMLA medical leave until September 1 of the following year, but would be able to take 16 weeks of family leave to care for a family member with a serious health condition within that same 24-month time period, and federal Medical Leave as described below.

Under the federal FMLA an employee is eligible for up to 12 work weeks of leave in a 12-month period for his/her own serious health condition, to care for a spouse, parent, son or daughter with a serious health condition, for the birth, adoption or placement for foster care of a child or to care for a newborn child. For example, if an employee takes 12 weeks of medical leave beginning September 1 for their serious health condition, they would not be able to take medical or family leave under the federal FMLA until September 1 of the following year, but may be able to take leave under DC FMLA as explained above.

If two family members are eligible for Family and Medical Leave, and both are employed by Capital City:

Capital City can limit these persons to an aggregate of 16 weeks of leave during any 24-month period for DC Family Leave if the leave is taken for the birth, placement, or adoption of a child, or to care for a family member who has a serious health condition; and 4 weeks of the Family Leave can be taken simultaneously.

If the leave only qualifies under the federal Family and Medical Leave Act, a combined total of 12 weeks of leave during any 12-month period can be taken if the leave is taken to care for the employee’s parent with a serious health condition, for the birth of the employee’s child or to care for the child after the birth, or for placement of a child with the employee for adoption or foster care or to care for the child after placement.

If the leave qualifies for service member Family Leave or a combination of service member and other Family Leave under the federal FMLA, the aggregate number of work weeks will be limited to 26 weeks during a single 12-month period.

## Circumstances Qualifying for Leave

### Leave for the Birth or Placement of a Child and to Care for Such Child

Eligible employees may take leave for the birth, adoption, or foster placement of a child and to care for the child after birth or placement. The leave(s) must be completed within the first 12 months after the child's birth or placement.

“Child” under federal FMLA means a biological, adopted or foster child, a stepchild, a legal ward, or a child of a person standing in loco parentis, who is either under age 18, or age 18 or older and incapable of self-care because of a mental or physical disability at the time that federal FMLA leave is to commence.

“Child” under DC FMLA includes a person under the age of 21, a person, regardless of age, who is substantially dependent on the employee due to a physical or mental disability or a person under the age of 23 who is a full-time student at an accredited college or university

### Leave to Care for a Family Member With a Serious Health Condition

Eligible employees may take leave to care for a family member with a serious health condition. For purposes of the DC FMLA leave policy, a “family member” is a spouse, domestic partner, parent, child, stepchild, adopted child, or any child with whom the employee is functioning in the role of a parent and any person to whom the employee is related by blood, legal custody or marriage; or a person with whom the employee shares or has shared within the last year a mutual residence and with whom the employee maintains a committed relationship. For purposes of federal FMLA, a “family member” is a spouse, or a child, or parent, of the employee.

A child must be under 18 years old, or if 18 years of age or older be incapable of self-care because of a mental or physical disability. “Spouse” means the other person with whom an individual entered into marriage as defined or recognized under state law for purposes of marriage in the state in which the marriage was entered into, or, in the case of a marriage entered into outside of any state, if the marriage is valid in the place where entered into and could have been entered into in at least one State. This includes common law marriage and same sex marriage in places where these marriages are recognized.

### Leave for the Employee's Own Serious Health Condition

Eligible employees may take leave in connection with their own serious health condition that makes the employee unable to perform the functions of their job.

### Leave to Care for a Service Member

Eligible employees may take up to 26 workweeks of leave in a single 12-month period to care for a spouse, child, parent, or next of kin who is a member of the Armed Forces, including a member of

the National Guard or Reserves, who is undergoing medical treatment, recuperation, or therapy, is otherwise in outpatient status, or is otherwise on the temporary disability retired list, for a serious injury or illness.

“Child” means a biological, adopted or foster child, stepchild, legal ward, or a child for whom the person stood in loco parentis, and who is of any age. For leave taken to provide care to a parent of a deployed military member, the parent must be incapable of self-care as defined by the FMLA.

### Exigent Leave

Eligible employees can take up to 12 workweeks of federal FMLA leave for any qualifying exigency arising out of the fact that the spouse, or a child, or parent of the employee is on active duty (or has been notified of an impending call or order to active duty) in the Armed Forces in support of a contingency operation. The total amount of federal FMLA leave which an employee can take, including for a qualified exigency, is 26 workweeks in a single 12-month period.

### Intermittent or Reduced Schedule Leave

Under some circumstances, employees may take FMLA Leave intermittently, which means taking leave in blocks of time, or by reducing the employee's normal weekly or daily work schedule. An employee may take leave intermittently whenever it is medically necessary to care for a seriously ill family member, or because the employee is seriously ill and unable to work. When an employee requests intermittent family leave for the birth, adoption, or foster care or other placement of a child, leave may be taken on a reduced-leave schedule so that the family leave are taken over a period not to exceed 24 consecutive workweeks. However, such a reduced leave schedule is contingent on agreement between the employee and Capital City.

Leave taken intermittently may be taken in increments of no less than one hour. Employees who take leave intermittently or on a reduced work schedule basis for a planned medical treatment must make a reasonable effort to schedule the leave so as not to unduly disrupt Capital City's operations. Employees should contact Human Resources and their supervisor prior to scheduling planned medical treatment. If FMLA Leave is taken intermittently or on a reduced schedule basis due to foreseeable planned medical treatment, we may require employees to transfer temporarily to an available alternative position with equivalent pay rate and benefits, including a part-time position, to better accommodate recurring periods of leave.

If an employee's request for intermittent leave is approved, Capital City may later require employees to obtain recertification of their need for leave. For example, Capital City may request recertification if it receives information that casts doubt on an employee's report that an absence qualifies for FMLA Leave.

## Other Leave Conditions

Any health benefits provided to the employee by Capital City will continue to be provided during family or medical leave. Whenever possible, such leave must be pre-approved by your Principal or supervisor and at least 30 days advance notice shall be given to Capital City by the employee. Otherwise, the maximum notice practicable must be provided, generally within one to two business days of knowledge of the probable need for leave. Every attempt should be made to schedule medical treatment so as to not unduly disrupt Capital City's operations. If the employee fails to provide 30 days notice for foreseeable leave with no reasonable excuse for the delay, the leave request may be denied until at least 30 days from the date Capital City receives notice.

Capital City may designate leave as FMLA after an employee returns to work if Capital City was unaware until the employee returned from absence that the absence qualified as FMLA or if Capital City knew the employee was absent but could not confirm the extent to which the leave was covered by FMLA.

## Use of Paid and Unpaid Leave

If an employee has available Sick Leave, Personal Leave, PTO or Maternity/Paternity Leave, it may be used according to the guidelines specified above to cover all or a portion of FMLA weeks, with the remainder of the Family and Medical Leave (FMLA) weeks taken as unpaid leave. If any or all of an employee's FMLA leave is unpaid, the employee will need to contact the Business and Human Resources Manager to make arrangements to pay the employee's portion of the health benefits premium.

## Return to Work Medical Certification

For leave due to an employee's own serious health condition, Capital City requires that the employee's physician complete a medical certification/authorization to return to work. The certification must be submitted to the Business & Human Resources Manager as well as the Principal or supervisor before an employee may return to work. If the employee does not provide the required medical certification supporting his/her ability to return to work, with or without reasonable accommodation, the employee is not permitted to resume work and may be terminated. If the employee's physician charges a fee for the medical certification/authorization, the employee must bear the cost of obtaining the certification.

## Job Reinstatement

Under most circumstances, employees will be reinstated to the same position they held at the time of the leave or to an equivalent position with equivalent pay, benefits, and other terms and conditions of employment. However, employees have no greater right to reinstatement than if they had been continuously employed rather than on leave. For example, if an employee would have

been laid off if he or she had not gone on leave or, if the employee's position was eliminated during the leave, then the employee will not be entitled to reinstatement.

## Confidentiality

Documents relating to medical certifications, recertifications or medical histories of employees or employees' family members will be maintained separately and treated by Capital City as confidential medical records, except that in some legally recognized circumstances, the records (or information in them) may be disclosed to supervisors and managers, first aid and safety personnel or government officials.

## Fraudulent Use of FMLA Prohibited

An employee who fraudulently obtains FMLA leave from Capital City is not protected by FMLA's job restoration or maintenance of health benefits provisions. In addition, Capital City will take all available appropriate disciplinary action against such employee due to such fraud.

## Nondiscrimination

Capital City takes its FMLA obligations very seriously and will not interfere with, restrain or deny the exercise of any rights provided by the FMLA. We will not terminate or discriminate against any individual for opposing any practice, or because of involvement in any proceeding related to the FMLA. If an employee believes that his or her FMLA rights have been violated in any way, he or she should immediately report the matter to **Human Resources**.

## LACTATION ACCOMMODATION

Capital City provides a supportive environment to enable breastfeeding mothers to express their breast milk during work hours. Capital City will provide a reasonable amount of break time to accommodate an employee desiring to express breast milk for the employee's child. The break time, if possible, should run concurrently with break and meal periods already provided to the employee. If the break time cannot run concurrently with break and meal periods already provided to the employee, the break may be unpaid. Where unpaid breaks or additional time are required, the employee will work with their Principal or supervisor regarding scheduling.

Capital City will make reasonable efforts to provide employees with the use of a room or private location near the employee's work location for the employee to express milk. This location may be the employee's private office, if applicable. Employees should discuss with their Principal, supervisor or the Business and Human Resources Manager the location to express their breast milk and for storage of expressed milk, and to make any other arrangements under this policy.

Capital City strictly prohibits discrimination against or harassment of employees because they are breastfeeding mothers and/or request or take breaks in accordance with this policy.

## PARENTAL LEAVE

Capital City provides each of its employees up to 24 hours of unpaid Parental Leave each year to attend or participate in a child's school or school-related events. School-related events include, but are not limited to, parent-teacher conferences, and child participation in plays, concerts, or sports events, including practices and rehearsals.

Parents include mothers and fathers, legal guardians, a person who acts as a guardian whether or not legally appointed, aunts, uncles, grandparents, and any person married or partnered to one of the individuals listed above.

If employees are interested in taking unpaid Parental Leave, they must notify their supervisor at least 10 calendar days in advance of the planned leave unless the event could not have been reasonably foreseen. In the case of unexpected events, the supervisor must be notified immediately. Employees are granted the leave only if their absence does not seriously disrupt Capital City's operations or the activities scheduled at that time for their department or school. Employees may elect to use available paid leave (personal or annual) while on Parental Leave.

Capital City employees attending parent-teacher conferences, expedition showcases, or performances at Capital City for Capital City students during the work day must request such time from their supervisor. They will generally not be charged leave, but if leave is not taken, they are expected to make up for the time lost from work. Longer absences (for example, chaperoning fieldwork) require advance approval by a supervisor and use of paid or unpaid leave.

## MILITARY LEAVE

Capital City is committed to protecting the job rights of employees absent on military leave and complies with all requirements of the Uniformed Services Employment and Reemployment Rights Act (USERRA), the National Defense Authorization Act, and all applicable local laws. It is Capital City's policy that no employee or prospective employee will be subjected to any form of discrimination on the basis of that person's membership in, or obligation to perform service for, any of the uniformed services of the United States, or be subjected to retaliation or adverse employment action because such person has exercised their rights under this policy. If any employee believes that they have been subjected to discrimination in violation of this policy, the employee should immediately contact the Head of School.

Employees directed to participate in extended military duties in the U.S. Armed Forces that exceed 10 working days will be placed on an unpaid military leave of absence status for a period of up to five (5) years and will be entitled to rights and benefits according to applicable laws.

## SABBATICAL LEAVE

Employees who have been employed at Capital City in a full-time role for a minimum of five school years, may request a sabbatical leave for the purpose of engaging in activities that support personal and professional growth and development. Sabbatical leave is generally unpaid and can be taken for a full school year or part of a school year as specified in a sabbatical plan. Employees interested in applying for sabbatical leave, must submit a letter in writing to their Principal or supervisor outlining the length of leave and purpose. Sabbatical leave requests must be submitted at least six months in advance of the intended leave. Many factors are considered in reviewing requests including the length of service to Capital City, activities planned for the leave, and the ability of the school to provide quality instruction in the teacher's absence or coverage for the non-instructional employee. If leave is approved by the Principal or supervisor, a sabbatical plan will be drafted.

Employees on sabbatical leave will retain previously accrued Sick Leave or PTO, but will not accrue additional leave during their absence. Teachers on sabbatical leave will maintain their step level for salary purposes, but will not receive a step increase for the sabbatical year unless they have worked for at least three months of the year. On return from sabbatical at the time outlined in the sabbatical plan, employees will be granted their same or an equivalent position with equivalent benefits, pay, and other terms and conditions of employment. However, employees have no greater right to reinstatement or other benefits and conditions of employment than if they hadn't taken a sabbatical.

## SECTION VII: STANDARDS OF BUSINESS CONDUCT

### GENERAL POLICY

We expect our employees to be exemplary role models for one another and our students. It is necessary that employees comply with the policies and procedures outlined in the Personnel Policies for Capital City to operate efficiently, safely and in compliance with regulations governing the workplace. Beyond what is required in these policies, however, we expect employees to use good judgment in all matters and to behave according to generally accepted standards of professional conduct. Not only can misconduct jeopardize employment, but it can also teach the wrong values and behaviors to the students that we serve.

Any employee who violates a law, regulation, or Capital City policy will be subject to disciplinary action, up to and including termination. In addition, disciplinary action may result from encouraging others to violate the law, regulations, or Capital City policies; failing to cooperate in an investigation

of possible violations; failing to promptly report violations of law, regulations, or Capital City policies to appropriate management personnel; retaliating against another employee for reporting or participating in the investigation of a concern or violation; or failing to effectively monitor the actions of subordinates.

## REPORTING OF SUSPECTED CHILD ABUSE

Capital City's employees are required by law to know the procedures for reporting suspected child abuse and/or neglect, and to report suspected child abuse cases to the proper authorities. Failure to do so can result in prosecution.

In the event of suspected child abuse and/or neglect, employees must follow Mandated Reporter requirements. To ensure effective coordination with the authorities, employees should also share their concerns with their supervisor or Principal and Chief Operating Officer.

Reporting suspected child abuse and/or neglect is an individual responsibility, and employees are not excused from reporting by relying on a supervisor or administrator to make the report for them. A mandated reporter's willful failure to report suspected child abuse is subject to fines and/or imprisonment. In addition, failure to report suspected child abuse and/or neglect will be considered a serious disciplinary matter.

## BRIBES AND KICKBACKS

Capital City does not permit or condone bribes, kickbacks, or any other illegal, secret, or improper payments, transfers, or receipts by or to employees or employee friends, acquaintances, or family members. This prohibition applies both to the giving and the receiving of payments or gifts.

All payments and transfers of premiums and other items of value to employees of other entities or to such entities themselves shall be made openly and must be disclosed and authorized in advance by the Head of School or Board of Trustees. All fees, commissions and expenses paid to outside agents must be based upon proper billings, accurate record keeping, and reasonable standards for services rendered.

A violation of this policy will result in immediate and appropriate discipline, up to and including termination of employment.

## GIFTS AND ENTERTAINMENT

Except in connection with and specifically pursuant to programs officially authorized by Capital City, employees may not solicit or accept, directly or indirectly, any gift, gratuity, reward, money, objects of value, or premiums from any person or company that is doing, or seeking to do, business with Capital City, or that might influence or appear to influence the judgment or conduct

of the employee in the performance of his or her job. All employees must disclose transactions of this nature to their supervisor, Principal or the Head of School.

Employees may accept and/or give only gifts, gratuities, rewards, or favors when authorized by Capital City and when the value involved is nominal, or when it is customary in the industry, does not violate any laws, will not influence or appear to influence their judgment or conduct at Capital City, or the judgment or conduct of another, and clearly will not create an obligation to the donor.

## CONFLICTS OF INTEREST

Employees have an obligation to conduct business within guidelines that prohibit actual or potential conflicts of interest. An actual or potential conflict of interest occurs when an employee is in a position to influence a decision that may result in a personal gain for the employee or for a relative as a result of Capital City's business dealings. For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with an employee is similar to that of persons who are related by blood or marriage.

This policy establishes only the framework within which Capital City wishes the business to operate. The purpose of these guidelines is to provide general direction so that employees can seek further clarification on issues related to the subject of acceptable standards of operation. Employees shall never use their position with Capital City or information acquired during employment in a manner that may create a conflict, or the appearance of a conflict, between their personal interests and those of Capital City. All activities conducted as an employee of Capital City should always place the lawful and legitimate interests of Capital City over personal gain.

The following are examples of prohibited conflicts of interest in any aspect of their jobs:

- Acting as a director, officer, consultant, agent or employee of a supplier, customer, competitor or any entity that engages in business with Capital City;
- Owning a material interest in or being a creditor of or having other financial interest in a supplier, customer, competitor or any entity that engages in business with Capital City;
- Receiving from or giving to any supplier, customer or competitor gifts, gratuities, special allowances, discounts or other advantages not generally available to employees of Capital City;
- Having any significant direct or indirect personal interest in a business transaction involving Capital City;
- Conducting outside activities that materially detract from or interfere with the full and timely performance of an employee's job duties for Capital City; or
- Influencing commercial transactions involving purchases, contracts or leases in a way that would have a negative impact on Capital City or its business.

Employees should disclose anything that might be perceived as a conflict of interest to their supervisor, Principal or the Head of School. Any questions about whether an action or proposed course of conduct would create a conflict of interest should be immediately directed to immediate supervisors, Principals or the Head of School to obtain advice on the issue. The purpose of this policy is to protect employees and Capital City from any conflict of interest that may arise.

A violation of this policy will result in immediate and appropriate discipline, up to and including termination of employment.

This policy in no way prohibits employee affiliations or activities that are protected under applicable state and federal laws, including but not limited to any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to organize collectively and to speak with others about their terms and conditions of employment.

## CAPITAL CITY ASSETS AND INTELLECTUAL PROPERTY

Employees should make every effort to protect Capital City's assets and ensure their effective and efficient use. Theft, carelessness and waste have a direct impact on Capital City. Any suspected fraud, damage, or theft must be reported immediately to a Principal, Business & Human Resources Manager, or the Head of School. Prompt reporting of damages, defects, and the need for repairs could prevent deterioration of equipment and possible injury to employees or others. Employees who have questions about their responsibility for maintenance and care of equipment used on the job should consult their supervisor and the .

Capital City patents, trademarks, and copyrights are also assets to be protected. It is important that employees identify and disclose through appropriate Capital City channels any new ideas, works of authorship, technological advances, or unique solutions, so that Capital City can properly obtain protection for this intellectual property. This will enable Capital City to protect these new ideas and works from infringement. Employees should contact the Head of School with suspicions of any Capital City intellectual property being infringed or used without proper authorization.

All writings and creations made by employees in the course of or relating to their work for Capital City are owned by Capital City, and employees must take such steps as are necessary to protect the ownership interests of Capital City in such works. Capital City encourages employees to share at conferences and other venues, and requires employees to include the Capital City name or logo to properly attribute work to the school.

Unauthorized use or distribution of any Capital City proprietary information would violate this policy and could result in civil or criminal penalties.

## CONFIDENTIALITY OF INFORMATION AND RECORDS

The protection of Capital City's business information, property and all other Capital City assets is vital to the interests and success of Capital City and the community it serves. All records and information relating to Capital City, including its employees, students, families, and suppliers, must therefore be treated confidentially and in compliance with the Family Educational Rights and Privacy Act (FERPA) and all other regulations as applicable. No Capital City-related information, including but not limited to, documents, files, records, computer files, equipment, office supplies or any other materials relating to Capital City's operations, may be removed from Capital City premises without permission from their supervisor, the Chief Operating Officer or Head of School.

Additionally, the contents of Capital City's records or information otherwise obtained regarding Capital City business may not be disclosed to anyone, except those with both a specific business need and authorization to receive such information. Employees may not disclose any confidential information, purposefully or inadvertently through casual conversation, to any unauthorized person inside or outside Capital City. Employees who are unsure about the confidential nature of specific information must ask their Principal or supervisor for clarification. In addition, employees may not access documents or files that they do not have permission to access. Concerns about any student's health, safety or welfare should be raised directly with the student's parent or guardian, or the Principal.

When transmitting confidential information, employees should ensure that the transmission is secure. If the information is in paper form, it should be transmitted in a sealed envelope with the word "Confidential" on the envelope. Employees should not leave confidential information unsecured at any time. If employees have custody of confidential information and do not have access to locking files, they must notify their Principal or supervisor.

If employees improperly use or disclose confidential information, they will be subject to disciplinary action, up to and including termination of employment, as well as possible legal action, even if they do not actually benefit from the disclosed information.

## POLITICAL AND CHARITABLE CONTRIBUTIONS

Although employees are encouraged to be socially responsible and politically active, they may not contribute Capital City funds or assets to any political candidates, party, charity, or similar organization, unless such contribution is expressly permitted by law and has been pre-approved by the Board of Trustees. Employees who make personal, political contributions, or advocate for a specific political candidate, should make it clear that their donation(s) and opinions are not made on behalf of Capital City.

It is typical in the context of expeditions and projects for classes to raise money for charities. Although these are student-raised funds and not school operational funds, all plans to raise money for specific charities or donations to charities must be approved by the Principal or Head of School.

## OUTSIDE ACTIVITIES

Capital City recognizes the right of employees to engage in activities outside of their employment which are of a private nature and unrelated to school business. However, employees must disclose any possible conflicts so that Capital City may assess and prevent potential conflicts of interest from arising.

Employees should not engage in any outside work activities when such activities would: negatively impact the performance of their duties for Capital City; prevent them from fully performing their work for Capital City, including overtime assignments; involve companies that are doing or seeking to do business with Capital City, including actual or potential vendors; violate provisions of law or Capital City's policies or rules; and otherwise be in conflict with the interests of Capital City.

If employees desire to hold outside employment, they must discuss their intention with their Principal or supervisor and obtain approval. If Capital City determines that such outside work interferes with their performance or ability to meet the requirements of Capital City, the employee may be asked to terminate the outside employment if they wish to remain employed with Capital City. "Outside work" also includes taking on additional work duties at Capital City, such as coaching, employment in after-school programs, or other time commitments, and should be discussed in advance with Principals or supervisors.

Ten-month employees do not need the approval of a supervisor to pursue outside employment during the summer months, but should be aware of any potential conflicts of interest.

If an employee believes their outside work activities present a potential conflict of interest with Capital City, they must immediately notify their Principal or supervisor, who will determine if a conflict of interest exists.

Under certain circumstances, however, if an employee's personal conduct adversely affects their performance on the job or makes it impossible for them to carry out any or all of their job duties while at work, appropriate disciplinary action up to and including termination of employment may be appropriate.

An example of an activity that might adversely affect an employee's ability to perform their job duties is outside employment. While Capital City does not prohibit employees from holding other jobs, the following types of outside employment are generally prohibited (to the extent allowed under applicable law):

- Employment that conflicts with the employee's work schedule, duties and responsibilities or creates an actual conflict of interest;
- Employment that impairs or has a detrimental effect on the employee's work performance with Capital City;
- Employment that requires employee to conduct work or related activities during working times or using any of Capital City's tools, materials or equipment; and
- Employment that directly or indirectly competes with the business or the interests of Capital City.

For the purposes of this policy, self-employment is considered outside employment.

Capital City will not assume any responsibility for employees' outside employment. Specifically, Capital City will not provide workers' compensation coverage or any other benefit for injuries occurring from, or arising out of, such outside employment.

## PUBLIC RELATIONS

To ensure the quality and consistency of school information disseminated to media sources, all media inquiries are to be handled by the Head of School, or their designee, regardless of who the media representative is, whom they represent, or how innocuous the request may appear. Similarly, all press releases and other school publications are required to be approved by the Head of School or their designee prior to dissemination. Employees may not suggest that they speak for Capital City unless expressly authorized by the Head of School or their designee.

Employees cannot be precluded from speaking with members of the media on matters of public interest, but if they do so, they must expressly state that they are speaking only for themselves and not as a representative of Capital City. In doing so, employees are encouraged to promote positive media relations. Employees must refer all inquiries regarding Capital City to the Head of School, or their designee.

Any employee who wishes to publish an article or paper in which they will be affiliated with Capital City must obtain approval from the Head of School before publication.

## DRUG-FREE AND ALCOHOL-FREE WORKPLACE

Capital City is committed to providing a working environment free from the use of non-prescribed drugs and alcohol. Given the risks that arise if employees are attempting to perform their duties while using or having used drugs or alcohol, Capital City has adopted a zero-tolerance policy. As such, Capital City strictly prohibits the sale, purchase, use, or possession of or reporting to work under the influence of any intoxicating substances, non-prescribed narcotics, hallucinogenic drugs,, or other non-prescribed controlled substances while on Capital City premises and/or

property and/or during working hours. In addition, employees are prohibited from using alcohol during working hours and from reporting to work under the influence of alcohol. This provision does not apply to reasonable consumption of alcohol at Capital City-sponsored events, where providing alcohol for consumption by staff or other adults has been approved.

Employees who are taking prescription medications that may affect job performance are required to report the use of such medications and their possible side effects to their Principal or supervisor so that a determination can be made regarding their capacity to perform the essential functions of their jobs, either with or without a reasonable accommodation. Employees may be required to disclose the medication they are on or the medical condition for which they are taking the medication. To the extent possible, Capital City will keep this information confidential.

Marijuana remains illegal as a matter of federal law and therefore its use or possession violates this policy. Capital City will endeavor to accommodate individuals with disabilities, but will not accommodate the use of medical marijuana at work or excuse other policy violations related to medical marijuana.

Further, teachers should never keep medication for students or administer medication to students unless special approved circumstances exist such as an emergency or fieldwork. This includes over the counter medication like Tylenol, Ibuprofen or cough syrup. Students are not permitted to bring medications to school (over-the-counter or prescription). If you see a student with medication, take the medication from the student and contact the Director of Student Services or the Principal. The violation of this policy is grounds for immediate dismissal.

Student access to medication for self-administration or administration by a trained employee is covered by individual 504 Plans or other formal medical orders on file in the health suite. These plans/orders may grant exceptions from this policy under certain circumstances. Only staff certified under approved medication administration training programs are authorized to administer medication per medical orders or 504 Plan terms.

## Counseling and Rehabilitation

Employees who voluntarily seek help for substance abuse (self-referral) by contacting Capital City will be provided an opportunity to pursue counseling and rehabilitation. Capital City will make available to these employees information about counseling and rehabilitation services. An employee who is receiving counseling and/or treatment for substance abuse may use available vacation, sick leave, or, if eligible, family and medical leave. Health insurance often covers the costs of such services, but costs not covered must be paid by the employee. The employee cannot return to work until released by a treatment provider to do so, and when they receives a negative result on a return-to-work drug and/or alcohol test (as appropriate for that individual). In addition, the employee may be asked to submit to follow-up testing for a period following the return to work.

An employee's decision to seek help voluntarily will not be used as a basis for disciplinary action, although the individual may be transferred, given work restrictions or placed on leave, as appropriate. A request for help is considered voluntary only if it is made before the employee is asked to submit to any drug or alcohol test or is discovered to have otherwise violated this policy.

## Capital City's Right to Search

Capital City wishes to maintain a work environment that is free of illegal drugs, alcohol, firearms, explosives or other improper materials. To this end, Capital City prohibits the control, possession, transfer, sale or use of such materials on its premises to the extent permitted by applicable law. We require the cooperation of all employees in administering this policy.

Desks, lockers and other storage devices are provided for the convenience of employees but remain the sole property of Capital City. Accordingly, they, as well as any articles found within them, can be inspected by any agent or representative of Capital City at any time, either with or without prior notice.

In addition, to ensure the safety and security of employees and customers, and to protect our legitimate business interests, we reserve the right to question and inspect or search any employee or other individual entering or leaving company premises or job sites. The inspection or search may include any packages or items that the individual may be carrying, including briefcases, handbags, knapsacks, shopping bags, et cetera. If a non-exempt employee is present during any search or inspection, he or she must report the time spent during the search or inspection as working time. These items are subject to inspection and search at any time, with or without prior notice. We also may require employees to agree to reasonable inspection of their personal property and/or person while on the job or on Capital City's premises. The individual may be requested to self-inspect his or her personal property or person by displaying the contents of any packages and/or turning out his or her pockets, etc., in the presence of a representative of Capital City, typically a management employee of the same gender. Capital City will not tolerate any employee's refusal to submit to a search.

## CORPORAL PUNISHMENT CODE OF CONDUCT

Under no circumstances does Capital City tolerate the use or attempted use of corporal punishment against its students. Allegations of the use of, or condoning the use of, corporal punishment will be promptly investigated. If a Capital City employee is found to have violated Capital City's Corporal Punishment Code of Conduct, they may be subject to disciplinary action, up to and including termination of employment.

For the purposes of this policy, "corporal punishment" is defined as the use or attempted use of physical force on or against a student as punishment or in an attempt to modify the behavior, a "thought," or an "attitude" of the student.

Examples of prohibited contact include, but are not limited to:

- shoving
- striking
- grabbing
- shaking
- throwing of objects
- unreasonable restraint

Capital City employees are tasked with maintaining a safe and secure environment that is conducive to learning, and may, on a rare occasion, be required to use reasonable and appropriate physical intervention under circumstances such as:

- preventing a student from inflicting self harm
- protecting persons or property
- self-defense
- quelling a disturbance that threatens physical injury to another person
- obtaining possession of weapons or other dangerous objects on or within the control of the student

If any such circumstance arises, the employee involved should make a full report verbally and in writing to their Principal, supervisor and Chief Operating Officer immediately following the incident. Employees should be aware that if, in the judgment of the Principal or Chief Operating Officer they have engaged in abusive or inappropriate conduct directed at a student, Capital City may have no choice but to report the incident to the authorities and implement any disciplinary action/penalty that may be imposed.

## ROMANTIC AND FAMILY RELATIONSHIPS AT WORK

Capital City will not take any adverse employment action against any employee for engaging in romantic relationships during nonworking hours away from Capital City premises. However, we will consider such relationships when they affect an employee's job performance, occur during working time or on Capital City premises, or pose a danger of a conflict of interest.

A familial or intimate relationship among employees can create an actual or at least potential or perceived conflict of interest in the employment setting, especially where one relative, spouse, partner, or member of such a relationship supervises another relative, spouse, partner, or member. To avoid this problem, we may refuse to hire or place a relative or other intimately associated individual in a position where the potential for favoritism or a conflict exists.

If two employees marry, become related, or enter into an intimate relationship, they may not remain in a reporting relationship or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. In other cases where a conflict or the danger of a conflict arises, even if there is no supervisory relationship involved, the parties may be separated by reassignment or terminated from employment, at the discretion of Capital City.

For the purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage (e.g., domestic partnership or civil union status).

## STAFF-STUDENT RELATIONSHIPS

The relationship between a Capital City employee and a student should be professional at all times. It is Capital City's policy to prohibit any type of close personal relationship between a student and employee that could be deemed inappropriate. An employee shall not engage in any conduct with a student, which creates the appearance of impropriety or inappropriate conduct. Capital City teachers and staff shall not entertain students, socialize with students outside of school, or spend an excessive amount of time with students in such a manner as to create the impression to families, students, coworkers or the public that an unprofessional relationship exists. This includes driving a student in the employee's personal car or otherwise traveling alone with a student. To avoid the appearance of inappropriate conduct, employees should avoid being alone with a student, should not travel with a student in the employee's personal vehicle, and should not give personal gifts to students. Further information is available in Capital City's Sexual Abuse Prevention Policy. We recognize that staff are committed to the success of their students and often tutor students outside of school hours. Employees are discouraged from working with a single student alone during or after school hours and are encouraged to always be in Capital City of others to eliminate the appearance of impropriety.

It is the policy of Capital City to prohibit any type of sexual relationship, contact or sexually unwanted behavior or communication between a employees and a student. Prohibited behavior includes, but is not limited to: flirting and bantering with sexual overtones, physical contact with a student, dating or engaging in a personal relationship that is sexually motivated, having any physical sexual contact or sexual intercourse with any student. Employees should never communicate with students via social media sites, such as Facebook, chat rooms, instant messaging, texting, emails or other electronic communications except through official Capital City channels, and should behave professionally and appropriately at all times. This policy applies regardless of whether the student or the employee initiated the inappropriate behavior and whether or not the student welcomes or reciprocates the attention.

It is the obligation of all employees to report immediately conduct that they believe violates this policy, including student-initiated inappropriate behavior, to the Principal, Chief Operating Officer or Head of School. Capital City will investigate promptly and thoroughly any complaint of

inappropriate behavior. The investigation will be kept confidential to the extent possible. If it is determined an employee has engaged in inappropriate behavior, Capital City will take corrective action to ensure that the behavior ends and the employee will face disciplinary action up to and including termination. Further, where Capital City suspects an employee is mentally or physically abusing a student, Capital City will immediately report such knowledge or suspicion to either the Metropolitan Police Department of the District of Columbia or the Child and Family Services Agency.

## EMPLOYEE CONDUCT

To ensure orderly operations and to provide the best possible work environment, Capital City expects that employees will not engage in misconduct. Any misconduct may result in disciplinary action, up to and including immediate termination of employment.

The following list includes examples of misconduct, but is not intended to be all-inclusive, and does not change the employment-at-will relationship between employees and Capital City:

- inappropriate contact with a student, either verbal, physical or sexual in nature
- any interaction with a student which creates the appearance of impropriety
- using abusive or offensive language, making disparaging remarks, being discourteous, or threatening, coercing or interfering with employees, students, parents or visitors
- discrimination or harassment as set forth in Capital City's Equal Employment Opportunity, Harassment, and Sexual Harassment policies
- fighting or otherwise engaging in disorderly, threatening, or intimidating conduct in the workplace
- excessive or unexcused late arrivals or absences
- undue and unauthorized absence from duty during regularly scheduled work hours
- sleeping during scheduled work hours
- possession of, using, manufacturing, purchasing, distributing, selling, trading, or offering for sale or being under the influence of alcohol or illegal drugs in the workplace, or any other conduct that violates Capital City's Drug-Free and Alcohol-Free Workplace policy, including failure to submit to reasonable-suspicion testing
- negligence or improper conduct leading to damage of property owned by Capital City or by any employee, student, or visitor of Capital City
- theft or unauthorized possession, removal or use of property belonging to Capital City or any employee, student or visitor of Capital City
- unauthorized possession, use or copying of any records that are the property of Capital City or disclosure of proprietary or confidential information to any unauthorized persons
- falsification of timekeeping, employment, or other records, including misrepresentation when applying for sick leave, leaves of absence, or other time off
- misappropriation of funds or failure to handle funds in accordance with Capital City's guidelines

- committing a fraudulent act or a breach of trust
- soliciting or accepting gratuities or bribes of any nature
- gambling or conducting games of chance on Capital City's premises or during work hours
- failure to perform properly assigned work, refusal to perform service connected with your job, refusal to obey any reasonable directive given by management, or behaving in a disrespectful or other manner that would undermine management authority
- working on matters other than school business during working hours other than breaks
- failure to comply with safety standards, including failure to report a workplace injury as soon as possible, violation of security or safety rules, failure to observe safety rules or Capital City safety practices, negligence or any careless action which endangers the life or safety of another person, including tampering with any Capital City equipment, including safety equipment
- possession, transportation and/or use of firearms, explosives or other dangerous weapons on Capital City property, including parking lots, or at any Capital City event
  - this policy applies even if the individual is licensed to carry the weapon
  - the only exception to this policy is for police officers, security guards, or other individuals who have been given written permission to carry a weapon on Capital City premises
- smoking on Capital City premises or within 50 feet of a Capital City building entrance
- refusal to fully cooperate with Capital City in any investigation related to the workplace
- illegal conduct of any kind
- inducing or assisting other employees in violating any of the foregoing rules or other handbook policies
- conviction for violation of local, state or federal law while on duty or off duty, when such violation could have an impact on an employee's position or on Capital City
- lewd, indecent, or immoral behavior while on duty or Capital City premises
- gross negligence
- any other action deemed to constitute employee misconduct by Capital City

Although employment may be terminated at-will by either the employee or Capital City at any time, without following any formal system of discipline or warning, we may exercise discretion to utilize forms of discipline that are less severe than termination. Examples of less severe forms of discipline include verbal warnings, written warnings, demotions and suspensions. Although one or more of these forms of discipline may be taken, no formal order or procedures are necessary. Capital City reserves the right to determine which type of disciplinary action to issue in response to any type of performance issue or rule violation.

This statement of prohibited conduct does not alter or limit the policy of at-will employment. Either the employee or Capital City may terminate the employment relationship at any time for any reason, with or without cause, and with or without notice.

## SECTION VIII: USE OF ELECTRONIC RESOURCES AND OTHER COMPANY PROPERTY

### COMPUTER, INTERNET AND EMAIL USAGE

There is a separate policy that governs computers, technology and use of the internet. All staff must read and acknowledge receipt of this document annually.

## SECTION IX: DISPUTE RESOLUTION PROCEDURE

Capital City has adopted the following dispute resolution procedures to solve problems as quickly, fairly, and informally as possible. If an employee believes they have been treated unfairly regarding their employment, they are encouraged to use the following dispute resolution procedures:

- Step 1: In the event that an employee believes they have been treated unfairly, the employee should discuss the issue with their Principal or supervisor in an effort to resolve the issue.
- Step 2: If a resolution cannot be reached through discussion with the Principal or supervisor, the employee should submit their concern(s) in writing to the Head of School or their designee for resolution. The decision of the Head of School or their designee is final.
- Alternative Step 2: If the Head of School is the supervisor and the subject of the concern, the employee may, if unable to reach a resolution through Step 1, submit their concern in writing to the Chair of the Board of Trustees at [boardchair@ccpcs.org](mailto:boardchair@ccpcs.org).

Employees are required to cooperate with any investigation conducted by Capital City of any concern(s) raised by them or against them pursuant to these procedures. There will be no retaliation of any kind against any employee for participating in these dispute resolution procedures.

This policy in no way prohibits employees from engaging in activities that are protected under applicable state and federal laws, including but not limited to any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to speak with others, engage in workplace debates and protest about their terms and conditions of employment.

## SECTION X: TERMINATION OF EMPLOYMENT

### TERMINATION

All employment at Capital City is at will. Capital City may terminate a person's employment at any time for any or no reason with or without notice. An employee who is terminated involuntarily will receive their final paycheck by the next school day following the date of termination, as long as all school property has been returned.

### RESIGNATION

In the event an employee finds it necessary to resign during the school year, Capital City requests that the employee give written notice to the Principal or supervisor as soon as possible. In the case of instructional staff, at least 30 school days before the effective date of resignation is preferred. An employee who resigns will be paid either by the next regular payday or within seven (7) days after the date of resignation, whichever is earlier.

## SECTION XI: POLICY AGAINST WORKPLACE DISCRIMINATION AND RETALIATION

### EQUAL EMPLOYMENT OPPORTUNITY

Equal employment opportunity has been, and will continue to be, a fundamental principle at Capital City. Capital City's policy is to provide equal employment opportunity to all qualified applicants and employees regardless of their race, color, religion, sex (including pregnancy, childbirth or related medical conditions, breastfeeding and reproductive health decisions), age (18 and over), national origin, disability, sexual orientation, gender identity or expression, marital status, genetic information (including family medical history), veteran status, status as a special disabled veteran, uniformed service member, personal appearance, family responsibilities, matriculation (e.g., being enrolled in a college or university or in a business, nursing, professional, secretarial, technical or vocational school), political affiliation, lawful use of tobacco products and unemployment status, or any other protected criteria as established by federal or local law. This covers all areas of employment, recruitment, advertising, hiring, promotion, demotion, lateral reassignment, transfer, layoff, discharge, rates of pay or other compensation, training, or any other benefits. Employment decisions at Capital City are based solely upon relevant criteria, including an individual's capabilities, qualifications, training, experience and suitability.

The Chief Operating Officer has overall responsibility for the application of this policy and for maintaining reporting and monitoring procedures. Questions or concerns should be referred to the Chief Operating Officer. In the event a concern involves the Chief Operating Officer, the concern should be brought to the Head of School.

Appropriate disciplinary action, up to and including termination, will be taken against any employee who violates this policy.

## PROHIBITION OF DISCRIMINATION AND HARASSMENT

Capital City is committed to a work environment in which all employees are treated with respect and dignity. Each employee has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. Therefore, Capital City expects that all relationships among persons in the workplace will be business-like and free of bias, prejudice, and harassment.

Employees and applicants for employment shall not be discriminated against or harassed on the basis of any legally protected characteristic. This policy prohibits discrimination and harassment in all employment decisions, including, but not limited to, recruitment, hiring, compensation, benefits, training, promotion, demotion, transfer, layoff, termination, and all other terms and conditions of employment. This policy also prohibits discrimination and harassment by or towards co-workers, supervisors, or others with whom you come into contact, such as families, consultants, vendors or volunteers. Discrimination and harassment are prohibited wherever Capital City work is being performed, whether in a Capital City building or in another location, during a business trip, or during a business-related social event.

### Sexual Harassment

Capital City is committed to providing a work environment that is free from sexual harassment. In compliance with federal and local laws, Capital City prohibits sexual harassment of employees by other employees, families, students, vendors, or volunteers in any form, whether or not the incidents occur on Capital City premises and whether or not the incidents occur during working hours. Capital City will investigate any complaints of sexual harassment and will take immediate and appropriate steps to ensure a safe workplace. Capital City will take disciplinary action, up to and including termination, if it finds that an employee has violated the school's prohibition against sexual harassment.

Sexual harassment consists of unwelcome sexual advances, requests for sexual favors, or other visual, verbal or physical acts of a sexual or sex-based nature where submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, an employment decision is based on an individual's acceptance or rejection of such conduct, or such conduct interferes with an individual's work performance or creates an intimidating, hostile or offensive working environment.

Determining what constitutes sexual harassment depends upon the specific facts and the context in which the conduct occurs. Sexual harassment may take many forms – subtle and indirect, or blatant and overt. Some examples of sexual harassment include, but are not limited to:

- unwanted sexual advances, including making sexual or romantic advances toward an employee and persisting despite the employee’s rejection of the advances;
- promising, directly or indirectly, rewards or employment benefits if the employee complies with a sexually-oriented request, and/or threatening, directly or indirectly, to retaliate against an employee if the employee refuses to comply with a sexually-oriented request;
- visual conduct that includes leering, making sexual gestures or displaying of sexually suggestive objects, pictures, cartoons or posters;
- verbal conduct that includes making or using derogatory comments, epithets, slurs or jokes, sexual advances or propositions, or verbal abuse of a sexual nature, graphic verbal comments about an individual’s body, sexually degrading words used to describe an individual, or suggestive or obscene letters, notes or invitations;
- engaging in sexually suggestive physical contact, or touching another employee in a way that is unwelcome, including touching, assaulting, or impeding or blocking movements; and
- displaying, storing, or transmitting pornographic or sexually-oriented materials using electronic communication devices or social media while on duty or Capital City resources.

Conduct does not need to involve physical touching to be inappropriate sexual harassment. Sexual harassment may consist of repeated actions or may arise from a single incident. Sexual harassment may be conducted toward an individual of the opposite sex or same sex, and it can occur between peers, between individuals in a reporting relationship, or between an employee and anyone with whom they comes in contact in the course of their employment with Capital City.

## Harassment Other Than Sexual Harassment

Harassment other than sexual harassment is also prohibited and, if found to have occurred, will result in discipline for the offending employee, up to and including termination. Harassment other than sexual harassment is verbal, physical, or visual conduct that denigrates or shows hostility or aversion to an employee based on a legally-protected characteristic when such conduct has the purpose or effect of unreasonably interfering with an employee’s work performance, creating an intimidating, hostile or offensive work environment, or otherwise adversely affecting an individual’s employment conditions. Capital City will not tolerate such conduct.

The following behaviors, among others, are improper and may lead to discipline, including termination of the offending employee:

- epithets, slurs, negative stereotyping, or threatening, intimidating or hostile acts that relate to an employee’s status (e.g., an employee’s race, color, religion, sex, age, national origin, disability, sexual orientation, gender identity or expression, genetic information, marital status, veteran status, or any other status protected by law);

- written or graphic material that denigrates or shows hostility or aversion to an individual because of such status and that is placed or circulated in the workplace;
- jokes or teasing related to an employee's protected status; and
- retaliation for making harassment reports or threatening to report harassment.

If offended by the unwelcome conduct of another, employees are encouraged, whenever reasonably possible, to clearly and firmly tell the person engaging in the offensive conduct to cease. Otherwise, employees should follow the complaint procedure set forth below to let Capital City know that they have experienced or observed conduct which they believe is harassment.

## COMPLAINT PROCEDURE FOR CLAIMS OF UNLAWFUL HARASSMENT OR DISCRIMINATION

Capital City strongly urges the reporting of all incidents of discrimination, harassment or retaliation, regardless of the offender's identity or position. Individuals who believe they have witnessed or experienced conduct that is contrary to Capital City's Equal Employment Opportunity, anti-discrimination, sexual harassment or other harassment policies have a responsibility to immediately file a complaint with their supervisor, the Principal, the Head of School, the Chief Operating Officer or any other member of the leadership team with whom they feel comfortable. Complaints may be made verbally or in writing, and should be as detailed as possible, including the names of the individuals involved, the names of any witnesses, a description of the behavior, time(s) and date(s) of the incident(s), and any supporting documentation. Complaints shall be handled by the Chief Operating Officer. In the event a complaint involves the Chief Operating Officer, employees may raise concerns directly to the Head of School.

### Investigation of Complaints

All complaints of discrimination or harassment will be investigated promptly, thoroughly and impartially. The investigation may include individual interviews with the parties involved and, where necessary, with individuals who may have observed the alleged conduct or may have other relevant knowledge. Confidentiality will be maintained to the extent practical and permitted by law. Investigations will be conducted as confidentially as possible and related information will only be shared with others on a need-to-know basis. The investigation will be completed and a determination made and communicated to the employee as soon as practical. .

Capital City expects employees to cooperate fully in any investigation. Failure or refusal to cooperate in, or providing false information during an investigation may result in disciplinary action up to and including termination of employment.

## Manager's Responsibility

All supervisors and managers are responsible for:

- Implementing this policy, which includes, but is not limited to, taking steps to prevent harassment and retaliation;
- Ensuring that all employees under their supervision have knowledge of and understand this policy;
- Promptly reporting any complaints to the designated Human Resources representative so they may be investigated and resolved in a timely manner;
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this policy; and
- Conducting themselves, at all times, in a manner consistent with this policy.

If Capital City finds that a supervisor or manager has knowingly allowed or tolerated discrimination or harassment in violation of Capital City's policies, Capital City will take disciplinary action against such supervisor or manager, up to and including termination of employment. If it is determined after an investigation that an employee engaged in conduct in violation of this policy, that person will be subject to disciplinary action up to and including termination of employment.

## Non-Retaliation for Complaints

Capital City does not tolerate any retaliation against an employee who has, in good faith, reported sexual or other harassment or discrimination, who has participated in an investigation of harassment or discrimination, who has objected to such conduct or filing, testified assisted or participated in any manner in any proceeding or hearing conducted by a governmental enforcement agency.

Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

If an employee feels that they have been retaliated against in violation of this policy, they should report the matter promptly to management in the same manner as any other form of harassment or discrimination. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this policy is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken. If a complaint cannot be substantiated, Capital City may take appropriate action to reinforce its commitment to providing a work environment free from retaliation.

## Knowingly False Complaints

The initiation of a good faith complaint of harassment or retaliation will not be grounds for disciplinary action, even if the allegations cannot be substantiated. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination.

## PROHIBITION OF DISCRIMINATION AGAINST INDIVIDUALS WITH DISABILITIES

Capital City is committed to complying with applicable provisions of the Americans with Disabilities Act (ADA) and local laws, and ensuring equal opportunity in employment for otherwise qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis. Capital City prohibits discrimination against any otherwise qualified disabled employee or applicant with regard to job application procedures, hiring, advancement or discharge, compensation, job training, and any other terms, conditions and privileges of employment. A “qualified” employee or applicant is one who can perform the essential functions of a position with or without reasonable accommodation.

Consistent with this policy of nondiscrimination and in accordance with applicable law, Capital City will provide reasonable accommodation for the physical or mental limitations caused by the disability of an otherwise qualified employee or applicant. The disability must be known to Capital City, and Capital City must be aware of the employee’s need for a reasonable accommodation. Capital City will provide a reasonable accommodation so long as it would not impose an undue hardship on Capital City and the individual would not pose a direct threat to the health or safety of the individual, other employees or students.

Employees or applicants with disabilities, must contact their supervisor, Principal or the Business & Human Resources Manager, preferably in writing, if they believe that they need a reasonable accommodation to ensure equal opportunity in the hiring process, to perform the essential functions of their job, or to enjoy equal privileges of employment as are enjoyed by similarly situated employees without disabilities. Capital City encourages individuals with disabilities to request a reasonable accommodation.

**Capital City will also consider requests for reasonable accommodations for medical conditions related to pregnancy, childbirth and lactation where supported by medical documentation and/or as required by applicable federal, state or local law.**

Upon receipt of an accommodation request, the Chief Operating Officer or their designee will meet with the employee and, if appropriate, their immediate supervisor to discuss their limitations related to the disability, and possible accommodations.

Capital City generally will determine the feasibility of an accommodation by considering various factors. For example, Capital City may consider the nature and cost of an accommodation, Capital City's overall financial resources and an accommodation's impact on the operation of Capital City, including whether it would be disruptive, would impact other employees' ability to perform their duties and/or would impact Capital City's operations.

Applicable law does not require Capital City to make the best possible accommodation from the employee's perspective, nor does it require Capital City to reallocate essential job functions or provide personal use items (e.g., eyeglasses, hearing aids, wheelchairs). Capital City is required to provide an accommodation that effectively allows employees to perform their essential job duties. If an employee disagrees with Capital City's decision concerning a requested accommodation, they may use the dispute resolution policy.

## Pregnancy Accommodation

Employees and applicants may request a reasonable accommodation for pregnancy, childbirth or related medical conditions or breastfeeding. As set forth above, a reasonable accommodation will be provided unless the accommodation would impose an undue hardship on Capital City's business operations.

Reasonable accommodations may include but are not limited to: more frequent or longer breaks; time off for pre-birth complications or to recover from childbirth; the acquisition or modification of equipment or seating; the temporary transfer to a less strenuous or hazardous position; other job restructuring, such as light duty or a modified work schedule; avoidance of heavy lifting; relocation of the employee's work area; or the availability of private, non-bathroom space for the expression of breast milk.

Employees who take leave or are provided a temporary transfer as an accommodation under this policy will be reinstated to their original job or to an equivalent position with equivalent pay, accumulated seniority and retirement, benefits and other applicable service credits upon their notification to Capital City of their intent to return to work or when the employee's need for a reasonable accommodation ends.

Capital City may require that employees provide a certification from their health care provider regarding the medical advisability of a reasonable accommodation. Capital City will not take adverse employment actions against employees or applicants because they request or use reasonable accommodations in accordance with this policy.

Employees who have questions about this policy or who wish to request a reasonable accommodation under this policy should contact their supervisor, Principal or the Business & Human Resources Manager.

## Religious Accommodation

Capital City will provide reasonable accommodation for employees' religious beliefs, observances, and practices when a need for such accommodation is identified and reasonable accommodation is possible. A reasonable accommodation is one that eliminates the conflict between an employee's religious beliefs, observances, or practices and the employee's job requirements, without causing undue hardship to Capital City.

Capital City has developed an accommodation process to assist employees, management, and Human Resources. Through this process, Capital City establishes a system of open communication between employees and Capital City to discuss conflicts between religion and work and to take action to provide reasonable accommodation for employees' needs. The intent of this process is to ensure a consistent approach when addressing religious accommodation requests. Any employee who perceives a conflict between job requirements and religious belief, observance, or practice should bring the conflict and their request for accommodation to the attention of their supervisor, Principal or the Business & HR Manager to initiate the accommodation process. Capital City requests that accommodation requests be made in writing, and in the case of schedule adjustments, as far in advance as possible.

## WHISTLEBLOWER PROTECTION POLICY

Capital City Public requires directors, officers and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of the Capital City Public Charter School, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

### Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Capital City Public Charter School can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Capital City Public Charter School's code of ethics or suspected violations of law or regulations that govern Capital City Public Charter School's operations.

### No Retaliation

It is contrary to the values of Capital City Public Charter School for anyone to retaliate against any board member, officer, employee or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Capital City Public Charter School. 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.

## Reporting Procedure

Capital City Public Charter School has an open door policy and suggests that employees share their questions, concerns, suggestions or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with the Chief Operating Officer or Head of School. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to the Capital City Public Charter School's Compliance Officer, who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the Executive Director or the organization's Compliance Officer.

## Compliance Officer

The Capital City Public Charter School's Compliance Officer is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Compliance Officer will advise the Head of School and/or the Board of Trustees of all complaints and their resolution and will report at least annually to the Chairperson of the Finance Committee on compliance activity relating to accounting or alleged financial improprieties.

## Accounting and Auditing Matters

The Capital City Public Charter Schools Compliance Officer shall immediately notify the Audit Committee/Finance Committee of any concerns or complaint regarding corporate accounting practices, internal controls or auditing and work with the committee until the matter is resolved.

## Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation 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 disciplinary offense.

## Confidentiality

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

## Handling of Reported Violations

The Capital City Public Charter School's Compliance Officer will notify the person who submitted a complaint and acknowledge receipt of the reported violation or suspected violation. All reports will be promptly investigated and appropriate corrective action will be taken if warranted by the investigation.

Compliance Officer: Chief Operating Officer

# ACKNOWLEDGEMENT OF RECEIPT OF PERSONNEL POLICIES

I have received a copy of the Capital City Public Charter School Personnel Policies. I understand it is my responsibility to read this document, including, but not limited to, its provisions regarding Capital City's anti-discrimination, harassment, sexual harassment, conflict of interest, and confidentiality policies, and to bring any questions I may have about its provisions to my supervisor, Principal or the Chief Operating Officer. I understand that Capital City has provided me various alternative channels to raise concerns of violations of these Personnel Policies and encourages me to do so promptly so that Capital City may effectively address such situations, and I understand that nothing herein interferes with any right to report concerns, make lawful disclosures, or communicate with any governmental authority regarding potential violations of laws or regulations.

I agree to abide by and be bound by the rules, policies and standards set forth in the Personnel Policies.

I understand that this Personnel Policy replaces and supersedes any previous handbooks, manuals, or personnel policies that I have received or that have been issued by Capital City Public Charter School. I understand that Capital City may change, modify, amend or delete any or all of the contents of these Personnel Policies at any time.

I understand and acknowledge that nothing in these Personnel Policies or in any other document or policy is intended to prohibit me from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to or participating in an investigation or hearing conducted by the Equal Employment Opportunity Commission ("EEOC"), National Labor Relations Board ("NLRB"), Securities and Exchange Commission ("SEC") or any other federal, state or local agency charged with the enforcement of any laws.

I also understand and acknowledge that nothing about the policies and procedures set forth in these Personnel Policies should be construed to interfere with any employee rights provided under state or federal law, including Section 7 of the National Labor Relations Act.

Employee Signature:

Date:

Employee Printed Name:

PLEASE SIGN AND RETURN THIS ACKNOWLEDGEMENT TO THE BUSINESS & HUMAN RESOURCES MANAGER