

To: Epicenter, DC Public Charter School Board

From: Tamika Maultsby

Date: October 8, 2019

Re: Employee Policies

Below are policy excerpts from the Friendship Employee Handbook regarding

- sexual harassment
- equal opportunity
- drug-free workplace
- staff complaint resolution process
- whistleblower policy

HARASSMENT/SEXUAL HARASSMENT

It is the policy of FPCS to maintain a professional business environment and a workplace that is free from harassment and intimidation of any kind.

Harassment consists of unwelcome conduct, whether verbal, non-verbal or physical, that threatens, intimidated or coerces often where the conduct is based on gender (including pregnancy, childbirth, or related medical condition), race, color, citizenship status, national origin, ancestry, age, genetic information, disability or perceived disability, sexual orientation, marital status, family care leave status, veteran status, religion, or any other characteristic protected by law. Verbal harassment includes, but is not limited to, derogatory comments, epithets, slurs, taunting and negative stereotyping. Non-verbal harassment includes, but is not limited to, touching, assaulting, blocking movements; the distribution, display or discussion or any written or graphic materials that ridicules, denigrates insults, belittles or shows hostility or aversion towards an individual or group.

A subset of harassment is sexual harassment. It is illegal and strictly against the FPCS's policy for any employee, male or female, to harass another employee by making or subjecting any person to unwelcome sexual advances or unwelcome requests for sexual favors, or to engage in any unwelcome or other verbal or non-verbal or physical conduct of a sexual nature that is persistent and offensive, where:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, or submission to or rejection of such conduct is used as the basis for an employment decision affecting the individual exposed or subjects to such conduct, or ☐ Such conduct has the purpose of effect of interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment. This includes, but is not limited to, the distribution, display or discussion of any written or graphic materials that has a sexual overtone.

Reporting Any person who feels he or she is being subjected to harassment/ sexual harassment is encouraged to report the harassment/ sexual harassment promptly, regardless of whether the harassment/ sexual harassment is by a fellow employee, or one of FPCS's outside vendors, consultants, customers, students, or clients.

Further, anyone who believes that an employee is harassing/ sexual harassing a fellow employee, or one of FPCS's outside vendors, consultants, customers, students, or clients should report this immediately to Human Resources, the employee's supervisor or any member of FPCS management with whom the employee feels comfortable. Individuals who believe they are being subjected to harassing/ sexual harassing or retaliatory conduct may also choose to promptly advise the offender that his or her behavior is unwelcome and request that the offensive behavior be discontinued.

Conduct prohibited by these policies is unacceptable in the workplace and in any work-related setting outside the workplace, such as during business trips, business meetings and business related social events. This behavior is unacceptable on company time and/ or using company equipment via e-mail, phone (including voice messages), text messages, tweets, blogs, social networking sites or other means.

To ensure that an employee wishing to report harassment/ sexual harassment do not have to report the incident to the person alleged to be the person harassing/ sexually harassing the employee, FPCS's policy provides that reports of sexual or other harassment may be made to any of the following, at the employee's choice: the employee's supervisor; Human Resources any member of the FCPS management with whom the employee feels comfortable or through the FPCS ERS hotline at (888)281-8436.

Investigation

Your complaint will be promptly and carefully investigated and FPCS will take the appropriate action. In addition, your complaint will be kept confidential to the extent possible consistent with a fair investigation.

FPCS will not condone or tolerate the harassment/ sexual harassment of its employees by its co-workers, managers or any other individual under our control, or by persons with whom we do business. All employees, regardless of position or title, will be subject to severe discipline, up to and including termination, should the Company determine that the employee is engaged in the harassment/ sexual harassment of another individual.

EQUAL EMPLOYMENT

Equal Employment Opportunity has been, and will continue to be, a fundamental principle at FPCS. FPCS's policy is to provide equal employment opportunity to all qualified applicants and employees regardless of their race, color, religion, sex, age, national origin, disability, sexual orientation, gender identity or expression, marital status, genetic information, veteran status, status as a special disabled veteran, or any other protected criteria as established by federal,

state, or local laws. This policy applies to recruitment and hiring, training, promotion, compensation, benefits, transfer, layoff, termination and all other terms and conditions of employment. Employment decisions at FPCS are based solely upon relevant criteria, including an individual's capabilities, qualifications, training, experience and suitability.

FPCS will not tolerate any unlawful discrimination and prohibits any such conduct. Employees are required to report any situations they believe involve illegal discrimination. They should be brought to the attention of their supervisor, Human Resources or any other member of the administration with whom the employee feels comfortable. Reports also can be made anonymously through the ERS hotline at (888) 281-8436.

DRUG AND ALCOHOL-FREE WORKPLACE

Consumption or being under the influence of alcoholic beverages during working or school hours or the manufacture, distribution, dispensing, possession, or use of illegal drugs is strictly prohibited. This policy does not prohibit moderate alcohol consumption at school-sponsored events where alcohol is served.

FPCS is committed to providing an alcohol-free and drug-free work environment at all FPCS locations. FPCS is also committed to providing assistance to employees who voluntarily seek help with alcohol and/or substance abuse problems. If you believe you need help with such problems, you are encouraged to contact the Employee Assistance Program (888/281-8436).

DISPUTE RESOLUTION

Internal Problem Resolution

FPCS is committed to providing the best possible working conditions for its employees. Part of this commitment is encouraging an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from FPCS supervisors and management.

FPCS strives to ensure fair and honest treatment of all employees. Supervisors, managers, and employees are expected to treat each other with mutual respect. Employees are encouraged to offer positive and constructive criticism.

Problem Resolution Procedure If you disagree with established rules of conduct, policies, or practices, you may express your concern through the problem resolution procedure. No employee will be penalized, formally or informally, for voicing a good faith complaint with FPCS in a reasonable, business-like manner, or for using the problem resolution procedure.

If a situation occurs, in which you believe that a condition of employment or a decision affecting you is unjust or inequitable; you are encouraged to make use of the following steps. You may discontinue the procedure at any step. If you believe that you are being discriminated

against or harassed, you should follow the steps in the Equal Employment Opportunity policy or Complaint Procedure for Claims of Unlawful Harassment.

- Present your concern to your immediate supervisor or the School Business Manager at your school within five calendar days after an incident occurs. If your supervisor or School Business Manager is unavailable or if you believe it would be inappropriate to contact that person, you may present the problem to the Director of Human Resources or any other member of management.
- Your supervisor or School Business Manager is to respond to the problem during the initial discussion or within five calendar days, after consulting with appropriate management when necessary. Your supervisor or School Business Manager will document the discussion.
- If you maintain that the problem remains unresolved after discussion, you may present the problem to the Director of Human Resources within five calendar days after the discussion with your supervisor or School Business Manager.
- Human Resources will counsel and provide a resolution to the problem consistent with the supporting facts, applicable policies, precedence, business practices and state and federal law. If the solution provided by Human Resources does not resolve the issue then you will be directed to the COO for further resolution.
- If you are directed to the COO for further resolution, you should present the problem to the COO in writing within five (5) days of your meeting with Human Resources.
- After careful review of the information presented, the COO will inform you of a final decision regarding the problem presented within five calendar days from the date of submission, and will forward a copy of the written response to your file. The COO has full authority to make any adjustment deemed appropriate to resolve the problem.

WHISTLEBLOWER POLICY

This whistle blowing policy is intended to provide protections for you if you raise concerns regarding FPCS, such as concerns regarding incorrect financial reporting, unlawful activity, activities that are not in line with FPCS policy, including the Standards of Conduct, or activities which otherwise amount to serious improper conduct.

Harassment or victimization for reporting concerns under this policy will not be tolerated. Every effort will be made to treat the complainant's identity with appropriate regard for confidentiality.

This policy encourages employees to put their names to allegations because appropriate follow-up questions and investigation may not be possible unless the source of the information is identified. Concerns expressed anonymously will be explored appropriately, but consideration will be given to the seriousness of the issue raised, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources.

Concerns relating to financial reporting, unethical or illegal conduct may be reported directly to FPCS's Chief Operating Officer. Employees are encouraged to continue to report employment related concerns through their supervisor, Human Resources, or to the Chief Operations Officer.

Although you are not expected to prove the truth of an allegation, you should be able to demonstrate to the person contacted that the report is being made in good faith. Allegations in bad faith may result in disciplinary action.

The action taken by FPCS in response to a report of concern under this policy will depend on the nature of the concern. The amount of contact between the complainant and the person or persons investigating the concern will depend on the nature of the issue and the clarity of information provided. Further information may be sought from or provided to the person reporting the concern.