



## **Employee Policies**

Submitted to the District of Columbia Public Charter School Board  
October 7, 2019

## **SEXUAL HARASSMENT**

### **Statement of Policy**

It is the policy of Kingsman Academy to maintain a working environment free from sexual, racial, age-based, religious, ethnic, disability, sexual orientation, and any other form of harassment of any Kingsman Academy personnel or applicant. Such harassment in any manner or form is expressly prohibited. It is the policy of Kingsman Academy that all Kingsman Academy personnel, contractors, and applicants are to be treated in a respectful and professional manner. Also, no individual is to be subjected to any unwelcome conduct that is or should be known to be offensive because of his or her gender, race, age, religion, ethnicity, disability, sexual orientation, or other protected category. Further, no Kingsman Academy personnel shall engage in unwelcome and offensive conduct towards any individual that is motivated by the individual's gender, race, age, religion, ethnicity, disability, sexual orientation, or other protected category. The term "harassment" in this policy includes conduct which is contrary to this policy, even if it does not meet the legal definitions for harassment.

This policy applies to all employees, volunteers, contract workers, and all applicants for such positions.

All reported or reasonably suspected occurrences of harassment will be investigated in a confidential manner and as promptly and thoroughly as is practicable and necessary. Where harassment has occurred, Kingsman Academy will take appropriate disciplinary and/or other corrective action, up to and including termination.

There will be no retaliation against an individual who has in good faith complained about or reported alleged harassment or who has cooperated with an investigation of alleged harassment.

### **Types of Sexual Harassment**

For purposes of this policy, harassment includes the following:

#### **Hostile Environment Harassment**

Hostile environment sexual harassment may occur when there are unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature. Also, nonsexual conduct that is unwelcome and offensive and which is directed at an individual because of the individual's gender (female or male) may create a hostile environment. Racial, age-based, religious, ethnic, disability, sexual orientation, and other forbidden forms of harassment may occur when there is conduct which is motivated by or relates to an individual's race, age, religion, ethnicity, disability, sexual orientation, or other legally protected characteristics. In all such cases, hostile environment harassment occurs when such conduct is sufficiently severe or pervasive to and does: (1) unreasonably interfere with an individual's work performance, or (2) create an intimidating, hostile or offensive work environment.

#### **"Quid Pro Quo" Sexual Harassment**

"Quid Pro Quo" sexual harassment may occur when there are unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature, when: (1) submission to such conduct is an explicit or implicit condition of employment; or (2) submission to or rejection of such conduct is used as the basis for employment decisions.

### **Conduct Prohibited by the Policy**

Kingsman Academy's policy also prohibits any unwelcome harassing conduct, even if the conduct is not sufficiently severe or pervasive enough to create a hostile environment or is not "quid pro quo" harassment.

It is not possible to list all the conduct that may violate this policy or is otherwise unacceptable. The following are examples only:

- All unwelcome and offensive jokes, stories, comments, or verbal abuse of a sexual, age-based, religious, racial, or ethnic nature, or relating to or motivated by gender, race, age, religion, sexual orientation, or disability.
- Use of any degrading or derogatory words or language to describe or refer to any person, or any harsh or unfair conduct towards another person that is motivated by the person's gender, race, religion, or other protected category.
- The display in the workplace or on Kingsman Academy property of objects or pictures—whether print or electronic—that expressly or implicitly degrade individuals or groups on the basis of race, age, gender, religion, ethnicity, sexual orientation, or disability.
- Offering, promising, or granting preferential treatment to any employee or applicant because of that individual's age, religion, race, ethnicity, gender, sexual orientation, or disability, or as a result of, or in anticipation of, that individual's engaging in or agreeing to engage in sexual or romantic conduct, even if the conduct is consensual.
- Using Kingsman Academy e-mail, voice-mail, or Internet access for any purpose which reasonably is or should be known to be offensive because of its sexual, religious, racial or ethnic content, or its relationship to gender, sexual orientation, or disability. Note: no Kingsman Academy personnel shall use Kingsman Academy equipment to access media sites—including but not limited to Internet Web sites—known to contain material that is sexually prurient or graphic, or that promotes or advocates sexism, racism, or other forms of bigotry based on gender, race, religion, or other protected category. Refer to the technology policy for more information.
- Unwelcome flirtation, sexual advances, propositions, or pressures for sexual favors, and unwelcome inquiries into someone's sexual experience or activity, including but not limited to sexually foul language, leering and whistling, or other unwelcome sexually suggestive conduct.
- Unwelcome and unnecessary physical contact, other than incidental and/or innocuous contact.

## **Sexual Harassment and/or Discrimination Complaint Procedure**

### **Notification Procedures**

Any Kingsman Academy personnel or applicant who feels that he or she is being or has been subjected to harassment or who knows of or suspects the occurrence of harassment should promptly and in confidence inform his or her immediate supervisor or a Kingsman Academy representative. Alternatively, reports or complaints can be directed to Kingsman Academy's Human Resources department. If for any

reason a person does not feel comfortable reporting to one of these individuals, that person should report the matter to any Kingsman Academy supervisor.

In addition, all management and supervisory personnel at Kingsman Academy have an affirmative duty to report promptly to one of the individuals designated above any harassment that they observe, that is made known to them by others, or that they reasonably suspect has occurred.

### **Investigation Procedure**

All reported occurrences of harassment will be investigated as promptly and thoroughly as is practicable and as is required under the circumstances. The individual who makes the report or is the target of the alleged harassment will be assured that all forms of harassment are expressly prohibited, that Kingsman Academy will conduct a confidential investigation and that Kingsman Academy will take appropriate corrective action if harassment is found to have occurred.

Kingsman Academy will designate the individual who will be responsible for conducting the investigation of reported incidents of harassment. The timing, scope, and extent of the investigation will be determined by Kingsman Academy on a case-by-case basis, considering the circumstances of the alleged harassment. All investigations will be conducted to protect, as much as practicable, the privacy of, and minimize the suspicion toward, all persons concerned.

Kingsman Academy expects Kingsman Academy personnel who are contacted in connection with an investigation to cooperate fully.

### **Procedure Pending Investigation**

Pending the outcome of an investigation, reasonably necessary and prudent interim measures, such as separation of the complainant and the alleged offender, suspension of the alleged offender, temporary leave for the complainant, etc., will be taken at Kingsman Academy's discretion, taking into consideration the complainant's wishes, the seriousness of the accusations, the background of the situation, and any other relevant information.

### **Resolution and Outcome of Investigation**

Following an investigation, Kingsman Academy will take such action that it deems necessary or appropriate under the circumstances:

- **No Violation.** In the event that the investigation discloses no violation of this policy or is inconclusive, all necessary parties will be so advised.
- **Violation.** In the event that the investigation discloses a violation of this policy, Kingsman Academy will normally communicate its findings to both the complainant and the alleged offender. Based upon the totality of the circumstances, appropriate disciplinary and/or other corrective action, up to and including termination, will then be taken. The action taken will be reasonably calculated to prevent any further unacceptable conduct. It is within Kingsman Academy's discretion to determine the appropriate corrective action.
- If the complainant or the alleged offender is not satisfied with the resolution, he or she is encouraged to contact Kingsman Academy's Executive Director, who will render a final decision.

In the event an investigation of a reported or suspected occurrence of harassment fails to reveal harassment and instead reveals that any person has abused the policy by lodging a knowingly false or frivolous complaint, by fabricating facts, by failing to tell the truth, or by knowingly omitting important facts, Kingsman Academy may take appropriate disciplinary and/or other corrective action.

### **No Retaliation**

No individual who reports or complains about harassment or unacceptable conduct, or who assists Kingsman Academy in its investigation, will be subjected to retaliation. Anyone who feels that he or she has been the victim of, or threatened with, retaliation, should immediately inform one of the individuals identified above for purposes of receiving reports or complaints.

## **EQUAL OPPORTUNITY**

Kingsman Academy is an Equal Opportunity Employer. The School's EEO policy prohibits discrimination in employment based on race, color, religion, national origin, disability, sex, age, sexual orientation, marital status, or any other basis prohibited by applicable law. Kingsman Academy prohibits discrimination against individuals with disabilities and will reasonably accommodate applicants with a disability, upon request, and will also ensure reasonable accommodation for employees with a disability. Under this policy, equal employment opportunity is required in recruitment, hiring, training and development, promotion, termination, compensation, benefits, and all other terms, conditions, and privileges of employment as required by applicable law.

Any employee who feels that a violation of this policy has occurred should bring the matter to the immediate attention of his or her supervisor. An employee who is uncomfortable for any reason in bringing such a matter to the attention of his or her supervisor shall report the matter to another supervisor, office or division director, human resources representative, or the Executive Director. The School will investigate all such allegations and prohibits any form of retaliation against any employee making such a complaint.

Kingsman Academy also requires our employees to abide by applicable federal and state nondiscrimination laws in their dealings with all members of the Kingsman Academy community—including visitors, vendors, and suppliers.

## **DRUG-FREE WORKPLACE**

Kingsman Academy is committed to protecting the safety, health, and well-being of the students, employees, and other individuals at Kingsman Academy. The School recognizes that alcohol abuse and drug use pose a significant threat to these goals. Therefore, the School has established a Drug-Free Workplace Program that balances respect for individuals with the need to maintain an alcohol-free and drug-free environment. Kingsman Academy encourages employees to voluntarily seek help with drug and alcohol problems.

### **Applicability**

Any individual who conducts business for the School, is applying for a position at the School, or is conducting business on the School's property is covered by this Drug-Free Workplace Policy. This includes, but is not limited to, candidates who have received written offers of employment, executives, managers, supervisors, full-time employees, part-time employees, and volunteers.

The Drug-Free Workplace Policy is intended to apply whenever an individual is representing the school or conducting business for the School. Therefore, this policy applies during all working hours, whenever conducting business for or representing the School, while on School property, and at School-sponsored events.

### **Prohibited Behavior**

It is a violation of Kingsman Academy's Drug-Free Workplace Policy to use, possess, sell, trade, and/or offer for sale alcohol, illegal drugs, or intoxicants.

It is also a violation of the policy to tamper with the testing process or to refuse to submit to drug or alcohol testing when directed by Kingsman Academy to do so. The following actions by an individual shall be considered a refusal to submit to drug or alcohol testing:

- Tampering with the testing process in any way;
- Failure to appear for a required test;
- Failure to remain at the collection site for a required test;
- Failure to provide a specimen for a required test;
- Failure to permit direct observation when required by Kingsman Academy or the collector;
- Failure to provide sufficient urine for a drug test or adequate breath for alcohol testing without valid medical evidence and explanation of the inability from a licensed physician;
- Failure to take a second test when required;
- Failure to undergo a medical exam when required; or
- Failure to cooperate with any part of the testing process.

## **Circumstances for Testing**

### **Pre-Employment Testing**

All candidates who have received a written offer of employment will be required to undergo testing for commonly abused controlled substances in accordance with this policy. Candidates who refuse to submit to a drug test or who fail to show up for a drug test will no longer be considered for employment.

### **Reasonable Suspicion Testing**

Drug or alcohol testing is required when a supervisor has a reasonable belief that an employee is:

- under the influence of illegal drugs or alcohol;
- impaired in his or her ability to perform his or her duties due to the use of any drug, including prescription medication, or alcohol;
- in possession of any controlled substance or related paraphernalia while on duty or on School property;
- in possession of alcohol while on duty or on School property; or
- in possession of alcohol in a School vehicle.

### **Post-Accident Testing**

Drug or alcohol testing is required after an employee is involved in a vehicular or other type of accident while on duty that results in personal injury, property damage, or both, and in which the cause of the accident could reasonably be believed to have been, in whole or in part, the employee's use of drugs or alcohol.

### **Return-to-Duty Testing**

Drug or alcohol testing is required after an employee has completed drug or alcohol counseling and rehabilitation, but before that employee is permitted to return to work.

### **Follow-Up Testing**

A schedule for drug or alcohol testing shall be developed following successful completion of a counseling and rehabilitation program by an employee who disclosed to Kingsman Academy a drug or alcohol problem.

## **Notification of Convictions**

Any employee who is convicted of a criminal drug violation must notify the Executive Director in writing within five (5) calendar days of the conviction. The school will take appropriate action within thirty (30) calendar days of notification. Federal contracting agencies will be notified when appropriate.

### **Duty to Report**

Kingsman Academy employees are required to report any suspected drug or alcohol abuse on the part of another employee to a supervisor or to the Executive Director. The identity of the employee making the report will be held confidential to the full extent permitted by law.

### **Shared Responsibility**

A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play.

All employees are required to not report to work or be subject to duty while their ability to perform job duties is impaired due to on- or off-duty use of alcohol or other drugs.

In addition, Kingsman Academy encourages employees to:

- Be concerned about working in a safe environment.
- Support fellow workers in seeking help.
- Use the Employee Assistance Program (EAP).
- Report dangerous behavior to their supervisors.

It is supervisors' responsibility to:

- Inform employees of the Drug-Free Workplace Policy.
- Observe employee performance.
- Investigate reports of dangerous practices.
- Document negative changes and problems in performance.
- Counsel employees as to expected performance improvement.
- Refer employees to the Employee Assistance Program (EAP).
- Clearly state consequences of policy violations.

### **Communication**

Communicating the Drug-Free Workplace Policy to both supervisors and employees is critical to the success of the policy. To ensure all employees are aware of their role in supporting the School's Drug-Free Workplace Program:

- All employees will receive a copy of the policy and will be required to acknowledge receipt of the policy.
- The policy will be reviewed in orientation sessions with new employees.

- Hard copies of the policy will be available.
- Employees will have access to information about the dangers of alcohol and drug use and the help available to individuals with drug or alcohol problems.
- All supervisors will receive training to help them recognize and manage employees with drug or alcohol problems.

### **Testing Types and Methods**

#### **Substances Tested**

The following substances are tested for under this policy:

- Amphetamines;
- Cannabinoids (THC);
- Cocaine;
- Opiates;
- Phencyclidine (PCP); and
- Alcohol.

#### **Testing Methods**

To ensure the accuracy and fairness of the testing program, all testing will be conducted according to Substance Abuse and Mental Health Services Administration (SAMHSA) guidelines where applicable and will include the following:

- A screening test;
- A confirmation test;
- The opportunity for a split sample;
- Review by a Medical Review Officer, including the opportunity for employees who test positive to provide a legitimate medical explanation, such as a physician's prescription, for the positive result; and
- A documented chain of custody.

All drug-testing information will be maintained in separate confidential records.

Each employee, as a condition of employment, may be required to participate in reasonable suspicion and return-to-duty testing upon selection or request of management.

Testing for the presence of alcohol will be conducted by analysis of breath, and testing for the presence of the metabolites of drugs will be conducted by analysis of urine.

### Searches

Entering the School's property constitutes consent to searches and inspections. If an individual is suspected of violating the Drug-Free Workplace Policy, he or she may be asked to submit to a search or inspection at any time. Searches can be conducted of desks and workstations and other School storage areas and containers.

### Consequences

One of the goals of the Kingsman Academy Drug-Free Workplace Program is to encourage employees to voluntarily seek help with alcohol and/or drug problems. If, however, an individual violates the policy, the consequences are serious.

### Applicant Violations

If an applicant violates the Drug-Free Workplace Policy, the offer of employment can be withdrawn. The applicant may reapply after six months and must successfully pass a pre-employment drug test taken at the applicant's expense.

### Employee Violations

If an employee violates the policy, he or she will be subject to progressive disciplinary action. Any employee who tests positive will be immediately removed from duty, referred to a substance abuse professional for assessment and recommendations, required to pass a Return-to-Duty test and sign a Return-to-Work Agreement. If an employee tests positive a second time or violates the Return-to-Work Agreement, he or she may be terminated immediately.

Any testing after the initial test shall be at the employee's expense.

### Rehabilitation

An employee who violates the policy may be required to enter rehabilitation or offered an opportunity to participate in rehabilitation. In such cases, the employee must sign and abide by the terms set forth in a Return-to-Work Agreement as a condition of continued employment. An employee required to enter rehabilitation who fails to successfully complete it or repeatedly violates the policy will be terminated from employment.

### Refusal to Submit to Testing or Tampering with Testing

Applicants and employees who refuse to submit to testing or who tamper with testing are subject to the same consequences of a positive test.

### Other Reasons for Discipline or Discharge

Nothing in this policy prohibits the employee from being disciplined or discharged for other violations or performance problems.

### **Employee Assistance and Rights**

#### **Assistance**

Kingsman Academy recognizes that alcohol and drug abuse and addiction are treatable illnesses. The School also realizes that early intervention and support improve the success of rehabilitation. To support employees, Kingsman Academy:

- Encourages employees to seek help if they are concerned that they or their family members may have a drug or alcohol problem;
- Encourages employees to utilize the services of qualified professional in the community to assess the seriousness of suspected drug or alcohol problems and identify appropriate sources of help;
- Makes available a current list of qualified community professionals;
- Offers all employees and their family members assistance with alcohol and drug problems through the Employee Assistance Program (EAP); and
- Allows the use of accrued paid leave while seeking treatment for drug or alcohol problems.

Treatment for alcoholism and/or other drug use disorders may be covered by the employee benefit plan. However, the ultimate financial responsibility for recommended treatment belongs to the employee.

#### **Confidentiality**

All information received by the School through the Drug-Free Workplace Program is confidential communication. Access to this information is limited to those who have a legitimate need to know in compliance with relevant laws and management policies.

It is the policy of Kingsman Academy to create and maintain a drug- and alcohol-free environment in the workplace, as required by the Drug-free Workplace Act of 1988. The abuse of alcohol or controlled substances (including the misuse or abuse of prescription drugs) or the use of illegal drugs, including but not limited to marijuana, cocaine, heroin, morphine, barbiturates, or amphetamines is inconsistent with the professional and responsible behavior we expect of employees, subjects all employees and visitors to unacceptable safety risks and undermines Kingsman Academy's ability to operate effectively and efficiently.

Therefore, the employees of Kingsman Academy are strictly prohibited from engaging in the unlawful manufacture, distribution, dispensation, possession, or use of controlled substances or illegal drugs, as defined above, on Kingsman Academy's premises or while conducting Kingsman Academy business off Kingsman Academy's premises.

Such conduct and/or use of illegal drugs or controlled substances is also prohibited during nonworking time to the extent that it, in the opinion of the management of Kingsman Academy (1) impairs the employee's ability to perform his or her job; (2) affects Kingsman Academy's reputation or threatens its

integrity; and (3) jeopardizes the employee and/or others in the workplace. Reporting to work while under the influence of illegal drugs, controlled substances, or alcohol is prohibited.

Employees who are convicted of offenses involving controlled substances or alcohol (including DUI) in the workplace must inform Human Resources within five (5) days of the conviction or plea. Employees who violate any aspect of this policy are subject to disciplinary action, up to and including immediate termination from Kingsman Academy.

An employee who is undergoing medical treatment with any controlled substance that may impair his/her physical or mental ability, even if a licensed physician has legally prescribed it, is strongly advised to report such treatment to her or his immediate supervisor so that an appropriate response can be made in the event of a reaction or emergency. Kingsman Academy will determine whether the employee constitutes a direct threat to himself/herself or others. If so, the employee shall not be permitted to work while undergoing such treatment.

## STAFF COMPLAINT RESOLUTION PROCESS

### Complaint Process—General

Kingsman Academy takes measures to maintain a harmonious environment as set forth in the “Courtesy” policy section of the handbook. Kingsman Academy **expressly prohibits any form of unlawful employee harassment, retaliation, discrimination, or inharmonious behavior as covered by the policies set forth in the “Work Environment” section of this manual.** It is incumbent upon every employee to abide by such environmental policies. Any employee who feels that the conduct of management or another employee is inappropriate or not in compliance with set policies is obligated to report their complaint in writing to their immediate supervisor. If the complaint is against the immediate supervisor, the employee should share their concerns with the next level of management. If the complaint entails discrimination or violation of laws protecting against discrimination, see “Notice of Procedural Safeguards” and “504 Grievance Procedure,” below.

All complaint reports will be thoroughly addressed by management and be subject to the determination of timing, scope, and extent by Kingsman Academy management on a case-by-case basis considering the nature of the complaint. In order to reach a fair resolution, all involved parties of the complaint will be requested to provide their interpretation of the complaint.

### Complaint Resolution Process—General

Except when otherwise indicated in the “Notice of Procedural Safeguards” and “504 Grievance Procedures” sections, below, Kingsman Academy follows the complaint resolution process described in this section. Following an investigation, Kingsman Academy will take such action that it deems necessary to reach a resolution:

- **No Violation.** In the event that the investigation discloses no violation of policy or is inconclusive, all parties deemed necessary by Kingsman Academy, including the complainant and the alleged offender, will be so advised.
- **Violation.** In the event that the investigation discloses a violation of policy, Kingsman Academy will normally communicate its findings to both the complainant and the alleged offender. Based upon the totality of the circumstances, appropriate disciplinary and/or other corrective action, up to and including termination, will then be taken. The action taken will be reasonably calculated to prevent any further unacceptable conduct. It is within Kingsman Academy’s discretion to determine the appropriate corrective action.

If the complainant or alleged offender is not satisfied with the resolution, he or she is encouraged to contact Kingsman Academy’s Executive Director, who will render a final decision.

In the event an investigation of a complaint fails to reveal a violation of policy and instead reveals that any person, including the complainant, has abused the policy by lodging a knowingly false or frivolous complaint by fabricating facts, by failing to tell the truth, or by knowingly omitting important facts, Kingsman Academy may take appropriate disciplinary and/or other corrective action.

### **Notice of Grievance Procedures for Employees**

Any employee who believes that Kingsman Academy has engaged in discrimination and/or harassment on the basis of race, color, religion, creed, sex, national origin, age, disability, veteran status, sexual orientation or otherwise may submit a complaint pursuant to Kingsman Academy's Grievance Procedures. A copy of the grievance procedures can be obtained by request through Human Resources Department.

### **504 Grievance Procedures**

Any person who believes that Kingsman Academy has engaged in discrimination and/or harassment on the basis of race, color, religion, creed, sex, national origin, age, disability, veteran status, sexual orientation or otherwise may submit a complaint to the designated individuals below.

Complaints involving students who attend Kingsman Academy may be submitted to your direct supervisor.

Complaints involving employees of Kingsman Academy may be submitted to:

Human Resources Department  
Kingsman Academy Public Charter School  
1375 E Street NE  
Washington, DC 20002  
(202) 547-1028

The grievance procedures outlined below establish how complaints will be investigated and resolved. These grievance procedures are intended to provide for a prompt and equitable resolution of complaints. These grievance procedures may be used by employees, students, parents, or third parties. These grievance procedures do not bar individuals from filing claims in other forums to the extent permitted by state or federal law.

Kingsman Academy encourages individuals to discuss their concerns with appropriate School officials before resorting to a formal complaint. However, individuals are not required to do so before filing a formal complaint.

Kingsman Academy prohibits retaliation against individuals who file a complaint or participate in a complaint investigation.

A formal complaint may be filed by following the steps outlined below:

#### **Step 1. Written Notice**

Within 90 days of the alleged discrimination or harassment, written notice of the complaint must be filed with the individual designated above. Complainants may use the complaint form attached to the grievance procedure. The written notice must include the nature of the complaint, the date(s) of the occurrence, the desired result, and must be signed and dated by the person making the complaint.

Upon receipt of the written notice of the complaint, the designated individual to whom the complaint was submitted will immediately initiate an adequate, reliable and impartial investigation of the complaint. Each

investigation will include, as necessary, interviewing witnesses, obtaining documents and allowing parties to present evidence. All documentation related to the investigation will remain confidential.

Within thirty (30) business days of receiving the written notice of the complaint, the individual investigating the complaint will respond in writing to the complainant. The response will summarize the course and outcome of the investigation, and identify an appropriate resolution. If, as a result of the investigation, it is determined that discrimination or harassment have occurred, appropriate corrective and remedial action will be taken.

### Step 2. Appeal to Executive Director

If the complainant wishes to appeal the decision from Step 1, he/she may submit a signed statement of appeal to the Executive Director within ten (10) business days after receipt of the response. The Executive Director will review all relevant information and meet with the parties involved, as necessary. Within twenty-one (21) business days of receiving the statement of appeal, the Executive Director will respond in writing to the complainant summarizing the outcome of the appeal and any corrective or remedial action to be taken.

Shannon Hodge, Executive Director  
Kingsman Academy  
1375 E Street NE  
Washington, DC 20002  
202-547-1028, Ext. 239

### Step 3. Appeal to Board of Trustees

If the complainant is not satisfied with the decision of the Executive Director he/she may appeal through a signed written statement to the Board of Trustees (the "Board") within ten (10) business days of the receipt of the Executive Director's response. In an attempt to resolve the grievance, the Board shall review all relevant information and meet with the concerned parties and their representatives within thirty (30) days of the receipt of such an appeal. A copy of the Board's disposition of the appeal shall be sent to each concerned party within fifteen (15) business days of this meeting.

Steve Messner, President  
Board of Trustees  
Kingsman Academy Public Charter School  
1375 E Street NE  
Washington, DC 20002  
(202) 547-1028  
president@kingsmanacademy.org

The complainant may file a complaint with the Office for Civil Rights at any time before or during the grievance procedures. The regional office for the District of Columbia is located at 400 Maryland Avenue, SW, Washington, DC 20202 and can be reached by phone at (202) 453-6020 or fax at (202) 453-6021.

## WHISTLEBLOWER POLICY

Kingsman Academy is committed to maintaining a workplace where employees are free to raise good faith concerns regarding the School's business practices, specifically:

1. reporting suspected violations of law on the part of the School, including but not limited to federal laws and regulations;
2. providing truthful information in connection with an inquiry or investigation by a court, agency, law enforcement, or other governmental body; and identifying potential violations of Kingsman Academy policy, specifically the policies contained in the Employee Handbook.

Kingsman Academy expressly prohibits any form of retaliation, including harassment, intimidation, adverse employment actions, or any other form of retaliation, against employees who raise in good faith suspected violations of law, cooperate in inquiries or investigations, or in good faith identify potential violations of School policies. Any employee who engages in retaliation will be subject to disciplinary action.

Detailed procedures for reporting and resolving issues at the School—including issues covered by this policy—appear under "Grievance Procedure." In addition, any employee who wishes to report a suspected violation of law or policy may:

- report it to her or his supervisor;
- report it to the next level of management if the issue involves a supervisor;
- report issues anonymously to the mailbox of Human Resources.