

Employment Practices

National Prep strives to maintain a workplace accepting of the difference in employees' ethnicities, cultures, ages, genders, physical and mental disabilities and sexual orientation. National Prep will not discriminate against any applicant or employee based on age, race, gender, color, religion, national origin, disability, marital status, covered veteran status, sexual orientation, or any other protected characteristic under District of Columbia or federal law. National Prep is committed to recruiting, hiring, training, and promoting qualified persons to all job titles without unlawful discrimination, and to administering personnel actions without any unlawful discrimination.

In the event an employee feels that he or she has been discriminated against by any action prohibited by law, he or she may seek the assistance of the Business Manager or the School Administrator, who is designated as the School's Civil Rights Administrators. Informal discussions to resolve the problem are encouraged before a formal complaint is made.

Complaints brought to the attention of National Prep will be handled in a confidential fashion, to the extent possible and practicable, will be investigated thoroughly and resolutions will be recommended. An employee may contact management without fear of retaliation regarding his or her employment status. However, frivolous or fraudulent complaints will not be entertained and may result in disciplinary action.

A. Anti-Discrimination and Harassment

National Prep does not tolerate unlawful discrimination or harassment in any form, and such conduct, if found to have occurred, will result in the imposition of discipline and corrective action, up to and including dismissal. Filing an honest complaint or honestly reporting racial or disability abuse or harassment will not jeopardize an employee's position with National Prep, nor will it affect future employment, compensation, work assignment, or status. Any individual with a discrimination or harassment complaint should refer to the procedures used in the reporting, investigation and resolution of the Sexual Harassment Policy described below.

The right of confidentiality for any party involved in a discrimination or harassment incident, including the complainant and the accused, will be respected insofar as it does not interfere with National Prep's obligation to investigate allegations of misconduct and to take corrective action where appropriate.

National Prep does not tolerate unlawful harassment or discrimination in any form, and such conduct will result in corrective action, up to and including dismissal. By policy and law, the unlawful harassment of students or of staff in the workplace is prohibited. Filing an honest complaint or honestly reporting harassment will not jeopardize an employee's

position at National Prep future employment, compensation, work assignment or status. National Prep has established a policy specifically for Sexual Harassment as follows. As explained above, the policy also will apply to complaints of discrimination and/or harassment based on protected characteristics other than sex.

B. National Prep's Sexual Harassment Policy

National Prep is committed to maintaining an environment in which the dignity of each member of its community is respected and a working and learning environment be created that is free from unlawful sexual harassment and that no employee or student shall be subjected to such unlawful harassment.

Sexual harassment, by, or of, either sex is prohibited by teachers, administrators, staff, students or other individuals who may be present on National Prep's property or in any other location for a School-sponsored activity – to engage in any form of sexual harassment or to retaliate in anyway against an individual who has initiated a sexual harassment complaint. National Prep maintains a "zero-tolerance" stance toward sexual harassment and will address and investigate all complaints in a timely, comprehensive and equitable fashion, once provided with information to suggest that such harassment may have occurred. It shall be a violation of this policy for any member of the student body or staff to harass another student or staff member through conduct or communications of a sexual nature as defined under this policy. Violators of this policy will be subject to appropriate corrective and disciplinary action, up to and including expulsion or termination.

Academic and non-academic management and supervisory personnel, at all levels, are responsible for taking reasonable and necessary action to prevent sexual harassment. All members of the National Prep community, teachers, administrators, staff, and students, are required to promptly report, pursuant to these policies and procedures, conduct that could be in violation of this policy.

Sexual harassment is defined, within the workplace for employees and/or within the academic experience for students, as any unwelcome sexual advances, demands, requests for sexual favors, innuendos or any other verbal or physical conduct of a sexual nature when:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or education experience;
2. Submission to or rejection of such conduct by an individual is used as the basis for employment or educational decisions affecting such individual;
3. Such conduct is sufficiently severe and pervasive so as to alter the conditions of, or have the purpose or effect of substantially interfering with, an individual's work or academic performance by creating an intimidating, hostile, or offensive working or educational environment.

Harassment does not include verbal expressions or written material that are relevant and appropriately related to course subject matter or curriculum.

National Prep will (1) respond to every complaint of sexual harassment reported, (2) take action to provide remedies when sexual harassment is discovered, (3) impose appropriate sanctions in a case-by-case manner, and (4) protect the privacy of all those involved in sexual harassment complaints to the extent it is possible.

C. Reporting Suspected Sexual Harassment

Any employee or student with a sexual harassment concern or question, prior to filing a formal complaint, may contact the Business Manager for counsel and assistance. Any individual, employee or student, who believes that he/she may have experienced sexual harassment, or who believes that he/she has observed sexual harassment taking place, must report this information immediately to one of the following reported official: the complainant's supervisor, where the supervisor is not the accused. If the supervisor is accused, the person will report to the School Administrator.

Reports/complaints in which the accused is neither a National Prep employee nor a student (e.g., vendors, visitors, etc.) shall be processed consistent with any other complaint by notifying one of the four reporting officials above, although National Prep reserves the right to alter or modify the procedures outlined below, in its sole discretion, in order to effectively handle these complaints.

D. Investigation of Sexual Harassment Complaints

Unless otherwise provided herein, responsibility for the investigation of sexual harassment complaints in which the accused is an employee (teacher, administrator, shall reside with the Director of Human Resources. Responsibility for the processing of sexual harassment complaints in which the accused is a student shall be with the Civil Rights Administrators. Designees may be appointed as alternate investigators as circumstances may warrant.

Complaints will be addressed as confidentially as possible and/or practicable, considering the specific circumstances of the allegations, to protect the rights of both the complainant and the person accused. The investigator may gather information from any sources deemed necessary in an effort to fully investigate and resolve the complaint.

The investigator will interview the complainant and the alleged offender and may also, at his/her discretion, interview witnesses, supervisors, and/or any other persons who may have information about the alleged incident. The investigator may review personnel or other records relevant to the complaint. The complainant and the accused

person shall be permitted to suggest witnesses and/or other evidence, which shall be considered by the investigator. A record shall be kept of all individual interviews.

E. Investigator's Conclusions

Upon receipt of the investigator's conclusions, National Prep will assess whether a violation of the policy has occurred and will the complainant, the person accused, his/her immediate supervisor and the Principal.

National Prep complies with the Americans with Disabilities Act of 1990, as amended (ADA) and the protections provided to individuals with disabilities found in the District of Columbia Fair Employment Act, not only in its hiring and employment practices, but also in other provisions of the Acts, including public access.

The ADA prohibits employment discrimination against "qualified individuals with disabilities." National Prep is committed to providing reasonable accommodations to its employees and applicants for employment in order to assure that individuals with disabilities enjoy full access to equal employment opportunity. While many individuals with disabilities can work without accommodation, other qualified applicants and employees may face barriers to employment without the accommodation process.

In accordance with the ADA and District of Columbia law, accommodations will be provided to qualified individuals with disabilities when such accommodations are directly related to performing the essential functions of a job, competing for a job, or to enjoy equal benefits and privileges of employment. This policy applies to all applicants and employees.

In implementing this policy, National Prep will be guided by the applicable definitions stated in the ADA or District of Columbia law.

An individual who needs a modified work environment as the result of a disability is encouraged to request a reasonable accommodation orally or in writing from his or her Supervisor or from the Principal. Employees requesting a reasonable accommodation will be required to submit medical verification for the need for the accommodation and may be required to sign an Authorization for Release of Medical Records to allow National Prep to communicate directly with the employee's health care providers.

The School Administrator is responsible for implementing this policy, including Resolution of reasonable accommodation, safety, and undue hardship issues. The School Administrator will review requests for accommodation. Some accommodations may only be provided on a temporary basis to determine whether they are reasonable and whether they create an undue hardship.

Once the School Administrator and employee agree to an appropriate accommodation, it will be implemented in a prompt and fair manner. Employees who have been provided reasonable accommodations will be reevaluated periodically to ensure that the accommodation is still reasonable and effective. In some cases, National Prep will provide an accommodation on a trial/temporary basis, in order to evaluate whether such accommodation is reasonable or whether it poses a hardship on National Prep.

Drug Free Workplace

National Prep is committed to maintaining a drug and alcohol-free work environment. The use and/or abuse of illicit drugs and alcohol directly interferes with the development and performance of the individual. The effects of that use/abuse diminish the working environment for all. It is a policy of National Prep that drugs and alcohol in the workplace will not be tolerated. Employees must abide by the spirit and letter of this policy as a condition of employment. Employees are not permitted to consume alcoholic beverages or take controlled substances during or immediately before the workday or during school sponsored functions on the property. Such actions of intoxication, being under the influence of an alcohol and/or controlled substances, or having alcohol and/or a controlled substance in an employee's system while on school property will necessitate immediate and decisive disciplinary measures, up to and including discharge. In addition, any employee convicted of a drug offense must report such conviction to the Principal within five calendar days. In accordance with the Drug-Free Workplace Act, the Department of Human Resources is required to report all such convictions to the appropriate grantor agency, if applicable, and to impose appropriate sanctions against the convicted employee. Such sanctions will include corrective actions, up to 15 and including discharge, and/or providing counseling and drug rehabilitation programs to the affected employee.

The unlawful manufacture, distribution, dispensation, possession or use of a controlled substance is prohibited at National Prep. Prohibited substances include but are not limited to, marijuana and other hallucinogens, opium and other narcotics, cocaine, amphetamines and their respective derivative forms not prescribed by a licensed physician for the treatment of a current medical disorder. The legal use of prescribed drugs is permitted on the job only if it does not impair an employee's ability to perform the essential functions of the job effectively and in a safe manner for the employee and fellow employees. Violations of this policy, which includes unlawful conduct, will be subject to corrective action, up to and including termination for all classifications of employees, depending upon the severity and/or frequency of the violation.

1. Any use of alcohol on School premises requires the approval of the school administration. In addition, if alcohol has been authorized on site, the following condition must be met: Food and alcohol-free beverages also must be served.

National Collegiate Preparatory Grievance Policy

Policy brief & purpose

Our grievance procedure policy explains how employees can voice their complaints in a constructive way. Supervisors and senior management should know everything that annoys employees or hinders their work, so they can resolve it as quickly as possible. Employees should be able to follow a fair grievance procedure to be heard and avoid conflicts. National Prep encourages employees to communicate their grievances. That way we can foster a supportive and pleasant workplace for everyone.

Scope

This policy refers to everyone in the company regardless of position or status.

Grievance

We define grievance as any complaint, problem or concern of an employee regarding their workplace, job or coworker relationships. Employees can file grievances for any of the following reasons:

- Workplace harassment
- Health and safety
- Supervisor behavior
- Adverse changes in employment conditions

This list is not exhaustive. However, employees should try to resolve less important issues informally before they resort to a formal grievance. Employees who file grievances can: Reach out to their direct supervisor, department head, Principal, CEO, or Chair of Board of Trustees, file a grievance letter explaining the situation in detail.

Employees who face allegation have the right to: Receive a copy of the allegations against them
Respond to the allegations
Appeal on any formal decision.

National Prep is obliged to:

- Have a formal grievance procedure in place
- Communicate the procedure
- Investigate all grievances promptly
- Treat all employees who file grievances
- Preserve confidentiality at any stage of the process
- Resolve all grievances when possible
- Respect its no-retaliation policy when employees file grievances with National Prep

Employees are encouraged to talk to each other to resolve their problems.

When this isn't possible, employees should know how to file a grievance:

- Communicate informally with their direct supervisor. The supervisor will try to resolve the problem.

- When employees want to complain about their supervisor, they should first try to discuss the matter and resolve it between them. In that case, they're advised to request an informal meeting.
- Supervisors should try to resolve any grievance as quickly as possible. When they're unable to do so, they will refer to the department lead or to HR and cooperate with all other procedures.

If the grievance relates to a supervisor behavior that can bring disciplinary action (e.g. sexual harassment or violence), employees should refer directly to Principal or CEO.

Administrative Reporting

The Principal or CEO will follow the procedure below with the Chair of Board of Trustees:

1. Ask employee to fill out a grievance form
2. Talk with the employee to ensure the matter is understood completely
3. Provide the employee who faces allegations with a copy of the grievance
4. Organize mediation procedures (e.g. arranging a formal meeting)
5. Investigate the matter or ask the help of an investigator when needed
6. Keep employees informed throughout the process
7. Communicate the formal decision to all employees involved
8. Take actions to ensure the formal decision is adhered to
9. Deal with appeals by gathering more information and investigating further
10. Keep accurate records For example, if an employee is found guilty of racial discrimination,

Once the investigation is concluded, National Prep will begin disciplinary procedures if necessary. All conclusions will be reported to the NCP Board of Trustees.

Whistleblower Policy

National Collegiate Preparatory Public Charter High School (NCP) is committed to operating in accordance with its mission and in compliance with all applicable laws, rules and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, officers, employees, or volunteers. This policy outlines a procedure where an employee may report an action that he/she reasonably believes violates a law, or regulation or that constitutes fraudulent accounting or other practices. This policy applies to any matter related to NCP's business operations and does not relate to private acts of an individual not connected to the business of NCP.

If an employee has a reasonable belief that an employee or board member of NCP has engaged in any action that violates any applicable law or regulation, including those concerning accounting and auditing, or constitutes a fraudulent practice, he/she is expected to immediately report such information to his/her immediate supervisor. If circumstances prevent him/her from reporting the information to his/her supervisor, he/she is expected to immediately report such information to the CEO. If circumstances prevent him/her from reporting the information to the CEO, he/she is expected to report the information to the Board Chair.

All reports will be followed up promptly, and an investigation will be conducted. In conducting investigations, NCP will strive to keep the identity of the individual filing the report confidential while conducting an adequate review and investigation.

NCP will not retaliate against any such employee in the terms and conditions of his/her employment because he/she: (1) report to a supervisor, CEO, Board of Directors, or a federal, state or local agency what he/she believes in good faith to be a violation of the law; (2) participate in good faith in any resulting investigation or proceeding; or (3) exercise his/her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect his/her rights.

NCP may take disciplinary action (up to and including termination) against an employee who engages in retaliatory conduct in violation of this policy.

In addition, NCP will not retaliate against any employee who has provided to law enforcement personnel, or in a court of law, truthful information relating to the commission or possible commission by NCP or any of its employees of a violation of any applicable law or regulation.