



Employee Sexual Harassment Policy

All Regions

Rocketship Public Schools ("Rocketship") is committed to maintaining a working environment that is free from harassment. Rocketship prohibits sexual harassment of Rocketship employees by anyone, in any manner, and shall not tolerate retaliatory behavior or action against a Rocketship employee or other person who complains, testifies, assist or otherwise participates in the complaint process established pursuant to this policy. For the purposes of this policy, Rocketship employees shall include applicants for employment at Rocketship. This policy was written in accordance with California Board Policy and Administrative Regulation 4119.11.

I. Definition

Prohibited sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature made against another person of the same or opposite gender in the work or educational setting when:

- Submission to the conduct is explicitly or implicitly made a term or condition of an individual's employment.
- Submission to or rejection of the conduct by an individual is used as the basis for employment decisions affecting the individual.
- The conduct has the purpose or effect of having a negative impact on the individual's academic or work performance, or of creating an intimidating, hostile, or offensive educational or work environment, or adversely affecting the individual's evaluation, advancement, assigned duties, or any other condition of education, employment, or career development.
- Submission to or rejection of the conduct by the individual is used as the basis for any decision affecting the individual regarding benefits and services, honors, programs, or activities available or through Rocketship.

Examples of conduct that is prohibited and which may constitute sexual harassment include, but are not limited to:

- Unwelcome leering, sexual flirtations, or propositions
- Unwelcome sexual slurs, epithets, threats, verbal abuse, derogatory comments, or sexually degrading descriptions
- Graphic verbal comments about an individual's body or overly personal conversation
- Sexual jokes, derogatory posters, notes, stories, cartoons, drawings, pictures, obscene gestures, or computer-generated images of a sexual nature
- Spreading sexual rumors
- Teasing or sexual remarks about students enrolled in a predominantly single-sex class
- Massaging, grabbing, fondling, stroking, or brushing the body
- Touching an individual's body or clothes in a sexual way

- Impeding or blocking movements or any physical interference with school activities when directed at an individual on the basis of sex
- Displaying sexually suggestive objects
- Sexual assault, sexual battery, or sexual coercion

II. Reporting Process and Complaint Investigation and Resolutions

Any employee who believes that he/she has been subjected to sexual harassment or who has witnessed sexual harassment is strongly encouraged to report the incident to his/her manager or Rocketship's Director of Human Resources. Within one school day of receiving such a report, the manager shall forward the report to the Director of Human Resources. In addition, any employee who observes an incident of sexual harassment involving an employee shall, within one school day, report his/her observation to the Director of Human Resources. The employee shall take these actions, whether or not the alleged victim files a complaint. In any case of sexual harassment involving the Director of Human Resources or any other person to whom the incident would ordinarily be reported or filed, the report may instead be submitted to Rocketship's Chief Executive Officer or designee.

When a report of sexual harassment is submitted, the Director of Human Resources shall inform the student or parent/guardian of the right to file a formal written complaint in accordance with Rocketship's uniform complaint procedures.

III. Investigation of Complaints at School Site Level

The Director of Human Resources or designee shall promptly (within 24 hours) investigate all complaints of sexual harassment. In so doing, he/she shall talk individually with:

- The employee who is complaining
- The person accused of harassment
- Anyone who saw the harassment take place
- Anyone mentioned as having related information

The employee who is complaining shall have an opportunity to describe the incident, present witnesses and other evidence of the harassment, and put his/her complaint in writing.

The Director of Human Resources shall discuss the complaint only with the people described above. When necessary to carry out his/her investigation or for other good reasons that apply to the particular situation, the Director of Human Resources also may discuss the complaint with the following persons:

- The Superintendent or designee
- An employee whose knowledge of the parties involved may help in determining who is telling the truth
- Rocketship legal counsel

When the employee who complained and the alleged harasser so agree, the Director of Human Resources may arrange for them to resolve the complaint informally with the help of a counselor,

teacher, administrator or trained mediator. The employee who complained shall never be asked to work out the problem directly with the accused person unless such help is provided.

In reaching a decision about the complaint, the Director of Human Resources may take into account:

- Statements made by the persons identified above
- The details and consistency of each person's account
- Evidence of how the complaining student reacted to the incident
- Evidence of past instances of harassment by the alleged harasser
- Evidence of past harassment complaints that were found to be untrue

To judge the severity of the harassment, the Director of Human Resources may take into consideration:

- How the misconduct affected one or more employees' work
- The type, frequency and duration of the misconduct
- The number of persons involved
- The age and sex of the person accused of harassment
- The subject(s) of harassment
- The place and situation where the incident occurred
- Other incidents in the workplace, including incidents of harassment that were not related to gender.

The Director of Human Resources shall write a report of his/her findings, decision, and reasons for the decision and shall present this report to the student who complained and the person accused.

IV. Confidentiality

All complaints and allegations of sexual harassment shall be kept confidential except as necessary to carry out the investigation or take other subsequent necessary action.

However, when a complainant or victim of sexual harassment notifies Rocketship of the harassment but requests confidentiality, the Director of Human Resources shall inform him/her that the request may limit Rocketship's ability to investigate the harassment or take other necessary action. When honoring a request for confidentiality, Rocketship will nevertheless take all reasonable steps to investigate and respond to the complaint consistent with the request.

When a complainant or victim of sexual harassment notifies Rocketship of the harassment but requests that Rocketship not pursue an investigation, Rocketship will determine whether or not it can honor such a request while still providing a safe and nondiscriminatory environment for all students.

V. Response Pending Investigation

When an incident of sexual harassment is reported, the Director of Human Resources shall determine whether interim measures are necessary pending the results of the investigation. The Director of Human

Resources shall take immediate measures necessary to stop the harassment and protect employees and/or ensure their access to a safe working environment. Rocketship should notify the individual who was harassed of his/her options to avoid contact with the alleged harasser and allow the complainant to adjust workplace arrangements as appropriate. Rocketship should also ensure that the complainant is aware of the resources and assistance, such as counseling, that are available to him/her. As appropriate, such actions shall be considered even when an employee chooses to not file a formal complaint or the sexual harassment occurs off school grounds or outside school-sponsored or school-related programs or activities.

VI. Notifications

A copy of Rocketship's sexual harassment policy shall:

- Be displayed in a prominent location in the main administrative building or other area of the school
- Be provided to each faculty member, all members of the administrative staff, and all members of the support staff at the beginning of the school year, or whenever a new employee is hired
- Appear in any Rocketship publication that sets forth the school's comprehensive rules, regulations, procedures, and standards of conduct

VII. Disciplinary Actions

Any Rocketship employee who permits, engages or participates in sexual harassment or sexual violence of another Rocketship employee or student shall be in violation of this policy and is subject to disciplinary action, up to and including dismissal. An employee shall be deemed to have permitted sexual harassment if he/she observes such harassment and fails to report to the appropriate authorities, whether or not the victim makes a complaint.

VIII. Prevention

The Director of Human Resources shall take all actions necessary to ensure the prevention, investigation, and correction of sexual harassment, including but not limited to:

- Providing periodic training to all staff regarding Rocketship's sexual harassment policy, particularly the procedures for registering complaints.
- Publicizing and disseminating Rocketship's sexual harassment policy
- Ensuring prompt, thorough investigation of complaints in a way that respects the privacy of all parties concerned, to the extent necessary
- Taking timely and appropriate corrective/remedial actions after completion of investigation.

IX. Record Keeping

The Director of Human Resources or designee shall maintain a record of all reported cases of sexual harassment to enable Rocketship to monitor, address, and prevent repetitive harassing behavior in the schools.

This policy is adopted by the Board of Directors of Rocketship Education, Inc.

Date: 11/16/17

Signed 
Frederick Ferrer, Board President
Rocketship Education

This policy is adopted by the Board of Directors of Rocketship Education Wisconsin, Inc.

Date: 11.21.17

Signed 
Ralph Weber, Board President
Rocketship Education Wisconsin

This policy is adopted by the Rocketship Education D.C., Public Charter School, Inc. Board of Trustees.

Date: 11/27/17

Signed 
Jolene Slotter, President, Board of Trustees

Equal Opportunity Employment (Policy #601)

Rocketship is an equal opportunity employer. It is the policy of Rocketship to afford equal employment and advancement opportunity to all qualified individuals without regard to:

- Race
- Color
- Gender (including gender identity and gender expression)
- Sex (including pregnancy, childbirth, breastfeeding, and medical conditions related to such)
- Religious creed (including religious dress and grooming practices)
- Marital/registered domestic partner status
- Age (forty (40) and over)
- National origin or ancestry (including native language spoken)
- Physical or mental disability (including HIV and AIDS)
- Medical condition (including cancer and genetic characteristics)
- Taking of a leave of absence pursuant to the Family Medical Leave Act ("FMLA"), Pregnancy, Disability Leave ("PDL") law, Americans with Disabilities Act ("ADA"), California Family Rights Act ("CFRA"), or the Fair Employment and Housing Act ("FEHA")
- Genetic information
- Sexual orientation
- Military and veteran status; or any other consideration made unlawful by federal, state, or local laws

This policy extends to all employees and to all aspects of the employment relationship, including the hiring of new employees and the training, transfer, promotion, compensation and benefits of existing employees.

To comply with applicable laws ensuring equal employment opportunities to qualified individuals with a disability, Rocketship will make reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee unless undue hardship would result.

Any applicant or employee who requires an accommodation in order to perform the essential functions of the job should contact a School representative with day-to-day personnel responsibilities and request such an accommodation. The individual with the disability should specify what accommodation he or she needs to perform the job. Rocketship Education then will conduct an investigation to identify the barriers that interfere with the equal opportunity of the applicant or employee to perform his or her job. Rocketship Education will identify possible accommodations, if any, that will help eliminate the limitation. If the accommodation is reasonable and will not impose an undue hardship, Rocketship will make the accommodation.

Safety, Security, and Health Substance Abuse Policy (Policy #651)

Rocketship is committed to promoting safety and employee health in the workplace and to creating a work environment that is conducive to attaining high work standards. The use of drugs and alcohol by employees can adversely affect the workplace health, safety, and productivity and can damage public confidence and trust in Rocketship Education.

To further its interest in avoiding accidents, to promote and maintain safe and efficient working conditions for its employees, and to protect its business, property, equipment, and operations, RSED has established this policy concerning the use of alcohol and drugs. As a condition of continued employment with RSED, each employee must abide by this policy.

Definitions

For purposes of this policy:

- 1) "Illegal drugs or other controlled substances" mean any drug or substance that (a) is not legally obtainable; or (b) is legally obtainable but has not been legally obtained; or (c) has been legally obtained but is being sold or distributed unlawfully.
- 2) "Legal drug" means any drug, including any prescription drug or over-the-counter drug, that has been legally obtained and that is not unlawfully sold or distributed.
- 3) "Abuse of any legal drug" means the use of any legal drug (a) for any purpose other than the purpose for which it was prescribed or manufactured; or (b) in a quantity, frequency, or manner that is contrary to the instructions or recommendations of the prescribing physician or manufacturer.
- 4) "Possession" means that an employee has the substance on his or her person or otherwise under his or her control.
- 5) "Reasonable suspicion" includes a suspicion that is based on specific personal observations such as an employee's manner, disposition, muscular movement, appearance, behavior, speech or breathe odor; information provided to management by an employee, by law enforcement officials, by a security service, or by other persons believed to be reliable; or a suspicion that is based on other surrounding circumstances.

Prohibited Conduct

The prohibitions of this section apply whenever the interests of RSED may be adversely affected, including any time an employee is:

- 1) On RSED premises, except in accordance with RSED's Alcohol on Campus Policy
- 2) Conducting or performing RSED business, regardless of location
- 3) Operating or responsible for the operation, custody, or care of RSED equipment or other property
- 4) Responsible for the safety of others in connection with, or while performing, RSED-related business.

Alcohol: The following acts are prohibited and will subject an employee to discipline, up to and including immediate discharge:

- 1) The unauthorized use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of alcohol
- 2) Being under the influence of alcohol.

Illegal Drugs: The following acts are prohibited and will subject an employee to discipline, up to and including immediate discharge:

- 1) The use, possession, purchase, sale, manufacture, distribution, transportation, or dispensation of any illegal drug or other controlled substance, including marijuana
- 2) Being under the influence of any illegal drug or other controlled substance, including marijuana.

Prescription Drugs: This policy prohibits:

- 1) The abuse of any legal drug
- 2) The purchase, sale, manufacture, distribution, transportation, dispensation, or possession of any legal prescription drug in a manner inconsistent with law
- 3) Working while impaired by the use of a legal drug whenever such impairment might endanger the safety of the employee or some other person, pose a risk of significant damage to RSED property or equipment; or substantially interfere with the employee's job performance or the efficient operation of the RSED's business or equipment.

Nothing in this policy is intended to prohibit the customary and ordinary purchase, sale, use, possession, or dispensation of over-the-counter drugs, so long as that activity does not violate any law or result in an employee being impaired by the use of such drugs in violation of this policy.

Drug Free Awareness Program

RSED has established a Drug-Free Awareness Program that is designed to inform employees about the dangers of drug abuse in the workplace and to help ensure that employees are familiar with this policy and with the disciplinary actions that can result from a violation of this policy. From time to time, employees will be requested to attend one of the sessions of the Drug-Free Awareness Program. During each such session, employees will be given current information about available programs offering counseling and rehabilitation.

Managers and supervisors should be attentive to the performance and conduct of those who work with them and should not permit an employee to work in an impaired condition or to otherwise engage in conduct that violates this policy. When management has reasonable suspicion to believe that an employee or employees are working in violation of this policy, prompt action will be taken.

Drug Testing

- 1) Reasonable Suspicion Testing: If RSED has reasonable suspicion that the employee is working in an impaired condition or otherwise engaging in conduct that violates this policy, the employee will be asked about any observed behavior and offered an opportunity to give a reasonable explanation. If the employee is unable to credibly or adequately explain the behavior, he or she will be asked to take a drug test in accordance with the procedures outlined below. If the employee refuses to cooperate with the administration of the drug test, the refusal will be handled in the same manner as a positive test result.
- 2) Procedures for Drug Testing: RSED will refer the applicant or employee to an independent, National Institute on Drug Abuse (NIDA)-certified medical clinic or laboratory, which will administer the test. RSED will pay the cost of the test and reasonable transportation costs to the testing facility. The employee will have the opportunity to alert the clinic or laboratory personnel to any prescription or non-prescription drugs that he or she has taken that may affect the outcome of the test. All drug testing will be performed by urinalysis. The clinic or laboratory will inform RSED as to whether the applicant passed or failed the drug test. If an employee fails

the test, he or she will be considered to be in violation of this policy and will be subject to discipline accordingly.

- 3) Acknowledgment and Consent: Any employee subject to testing under this policy will be asked to sign a form acknowledging the procedures governing testing, and consenting to (1) the collection of a urine sample for the purpose of determining the presence of alcohol or drugs, and (2) the release to RSED of medical information regarding the test results. Refusal to sign the agreement and consent form, or to submit to the drug test, will result in the revocation of an applicant's job offer, or will subject an employee to discipline up to and including termination.
- 4) Confidentiality: All drug testing-records will be treated as confidential.

Notification of Criminal Convictions

Employees must notify RSED of any conviction under a criminal drug statute for a violation occurring in the workplace or during any RSED-related activity or event. Employees must notify RSED within five days after any such conviction. When required by federal law, RSED will notify any federal agency with which it has a contract of any employee who has been convicted under a criminal drug statute for a violation occurring in the workplace.

Disciplinary Action

Violation of this policy may result in disciplinary action up to and including immediate termination. An employee who is convicted under a criminal drug statute for a violation occurring in the workplace or during any RSED-related activity or event will be deemed to have violated this policy. Mandatory participation in and satisfactory completion of an inpatient or outpatient drug or alcohol abuse assistance or rehabilitation program may become a condition of continued employment upon violation of this policy.

Alcohol on Campus (Policy #308)

Rocketship strictly prohibits alcohol on school campuses at all times during the instructional school year. This includes times when students are not on campus (i.e. evenings, weekends, or holidays). Alcohol is not to be stored in staff rooms on campus at any time.

However, Rocketship recognizes that schools may encounter rare situations in which it would be appropriate to consume limited amounts of alcohol on campus as part of a social event (i.e. meet-and-greet with community partners).

Alcohol may be permitted on campus in very limited circumstances outside of the instructional school year (i.e. during summer break or before a new campus opens to students), provided that the following circumstances are met:

- Both the Principal and the Human Resources Department must provide advance written approval of the event and the list of attendees.
- All alcohol is removed from the campus following the event.
- All staff members act responsibly and professionally and abide by all applicable school and network conduct policies and rules.

Alcohol is not permitted during holiday breaks that fall within the instructional school year, including winter and spring breaks.

If a staff member wishes to give another staff member alcohol as a gift (i.e. before the holidays or a birthday) during the instructional school year, the exchange must take place off-campus.

Additionally, all Rocketship employees must abide by Rocketship's Substance Abuse Policy, which can be found in the Employee Handbook.

Human Resources must be promptly notified of any violations to this policy. Rocketship Education reserves the right to prohibit any Rocketship campus from consuming alcohol under any circumstances if the campus is found to have violated this policy or otherwise engaged in conduct that would be deemed inappropriate by a reasonable person in light of the circumstances.

Internal Complaints

(Complaints by Employees Against Employees)

This section of the policy is for use when a school employee raises a complaint or concern about a coworker. If reasonably possible, internal complaints should be resolved at the lowest possible level, including attempts to discuss/resolve concerns with the immediate supervisor. However, in the event an informal resolution may not be achieved or is not appropriate, the following steps will be followed by the Principal or designee:

1. The complainant will bring the matter to the attention of the Principal as soon as possible after attempts to resolve the complaint with the immediate supervisor have failed or if not appropriate
2. The complainant will reduce his or her complaint to writing, indicating all known and relevant facts. The Principal or designee will then investigate the facts and provide a solution or explanation
3. If the complaint is about the Principal, the complainant may file his or her complaint in a signed writing to the Department of Human Resources, which may conduct a fact-finding or authorize a third party investigator on behalf of Rocketship. The Department of Human Resources or investigator will report the findings to Rocketship for review and action, if necessary.

This policy cannot guarantee that every problem will be resolved to the employee's satisfaction. However, Rocketship values each employee's ability to express concerns and the need for resolution without fear of adverse consequence to employment.



WHISTLEBLOWER POLICY

All Regions

Rocketship Education, Inc. (RSED) requires its directors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The purpose of this policy is to encourage and enable employees and volunteers of RSED to report any action or suspected action taken within RSED that is illegal, fraudulent, or in violation of any adopted RSED policy, to a source within RSED before turning to outside parties for resolution. This policy applies to any matter which is related to RSED's business and operations and relates only to those acts of an individual undertaken on behalf of RSED and subject to the direction of RSED. This policy is intended to supplement but not replace RSED's unlawful harassment and discrimination policies, complaint policies, and/or any other RSED employee policy or grievance procedure, or any applicable state and federal laws governing whistleblowing applicable to nonprofit organizations.

I. Violations; Reporting in Good Faith

All employees and volunteers of RSED are encouraged to report any action or suspected action taken within RSED that is illegal, fraudulent, or in violation of any adopted policy of RSED (each, a "Violation"). Anyone reporting a Violation must act in good faith, without malice to RSED or any individual inside RSED, and have reasonable grounds for believing that the information shared in the report indicates that a Violation has occurred. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly, or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense that may result in discipline, up to and including termination of employment or volunteer status.

II. No Retaliation

No employee or volunteer who in good faith reports a Violation or cooperates in the investigation of a Violation shall suffer harassment, retaliation, or adverse employment or volunteer consequences. Any individual within RSED who retaliates against another individual who in good faith has reported a Violation or has cooperated in the investigation of a Violation is subject to discipline, up to and including termination of employment or volunteer status.

If an individual believes that someone who has made a report of a Violation or who has cooperated in the investigation of a Violation is suffering from harassment, retaliation or other adverse employment or volunteer consequences, the individual should contact the RSED Compliance Officer.

Any individual who reasonably believes he or she has been retaliated against in violation of this policy shall follow the same procedures as for filing a complaint outlined in Section III below.

III. Reporting Process

If an individual reasonably believes that a Violation has occurred, the individual is encouraged to follow the procedures set forth in Rocketship's complaint policies. Reported Violations will be investigated and handled in accordance with Rocketship's complaint policies.

IV. Confidentiality

RSED encourages anyone reporting a Violation to identify him/herself when making a report in order to facilitate the investigation of the Violation. However, reports may be submitted on a confidential basis by the complainant or may be submitted anonymously by mailing the form to the Compliance Officer at:

Rocketship Education
Attn: Compliance Officer
350 Twin Dolphin Drive
Redwood City, CA 94065
or submitting an email complaint to compliance@rsed.org

Reports of Violations or suspected Violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation, to comply with all applicable laws, and to cooperate with law enforcement authorities. Furthermore, RSED will explore anonymous allegations to the extent possible, but will weigh the prudence of continuing such investigations against the likelihood of confirming the alleged facts or circumstances from attributable sources.

V. Accounting and Auditing Matters

The Business Committee is responsible for addressing reported complaints of Violations relating to corporate accounting practices, internal controls or auditing. The Compliance Officer and any RSED employee in the receipt of such a complaint may elect to report the complaint to the Business Committee.

This policy is adopted by the Board of Directors of Rocketship Education, Inc.

Date: _____

Signed

Frederick Ferrer, Board President
Rocketship Education