



WASHINGTON LATIN
PUBLIC CHARTER SCHOOLS

A Classical Education for the Modern World

EMPLOYEE POLICIES

SCHOOL YEAR 2022 - 2023

Equal Opportunity
Sexual Harassment & Title IX
Drug-free Workplace
Whistle Blower Policy
Staff Complaint Resolution Process

2nd Street Campus
5200 2nd Street, NW
Washington, DC 20011
202.223.1111

Cooper Campus
711 Edgewood Street NE
Washington, DC 20017
202.697.4430

www.latinpcs.org

EQUAL OPPORTUNITY & DIVERSITY STATEMENT

Washington Latin Public Charter Schools are committed to fostering, cultivating, and preserving a culture of diversity and inclusion. Diversity is an essential value, critical to the fabric of our culture. The collective sum of the individual differences, life experiences, knowledge, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and achievement as a school.

We embrace and encourage our employees' differences in age, color, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, learning styles, and types of intelligence, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

Our school aims to create an inclusive, integrated school population, even as the city remains segregated and as our residential population is gentrifying. We want all members of our community to not only have a sense of belonging, but also to believe that they can bring their authentic selves to work.

Washington Latin's diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and family programs; and the ongoing development of a work environment built on the following expectations:

- ☑ Respectful communication and cooperation between staff.
- ☑ Teamwork and staff participation, permitting the representation of all groups and employee perspectives.
- ☑ Work/life balance through flexible work schedules to accommodate employees' varying needs.
- ☑ Contributions to the communities we serve to promote a greater understanding and respect for the diversity beyond our walls.

The worth and dignity of every person at all levels of work, study and play are paramount at Washington Latin across any artificial lines of exclusion. We are committed to embracing all of our diversity even as it evolves. Our commitment to the diversity of our student body requires a mirror image of that diversity in the composition of faculty, staff, administration, and Board members, and will likewise be reflected in our curriculum.

The staff of Washington Latin have a responsibility to **always** treat others with dignity and respect. Employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other school-sponsored and participative events. Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the school's diversity policy and initiatives should seek assistance from a supervisor, the Head of School or the Human Resources representative, working with the Business Office.

Notice of Non-discrimination

In accordance with Title VI of the Civil Rights Act of 1964 ("Title VI"), Title IX of the Education Amendments of 1972 ("Title IX"), Section 504 of the Rehabilitation Act of 1973 ("Section 504"), Title II of the Americans with Disabilities Act of 1990 ("ADA"), and the Age Discrimination Act of 1975 ("The Age Act"), applicants for admission and employment, students, parents, employees, sources of referral of applicants for admission and employment, and all unions or professional organizations holding collective bargaining or professional agreements with Washington Latin Public Charter School ("Washington Latin") are hereby notified that Washington Latin does not discriminate on the basis of race, color, national origin, sex, age, or disability in admission or access to or employment in its programs and activities.

For inquiries or to file a complaint regarding Washington Latin's compliance with ADA, Section 504 as they relate to employees or third parties, and compliance with Title VI, Title IX, and the Age Act as they relate to students, employees and third parties, please contact the Director of Operations, who has been designated by Washington Latin to coordinate its efforts to comply with the regulations implementing Section 504 and ADA as they relate to employees and third parties, and Title VI, Title IX, and Age Act as they apply to students, employees and third parties. Employees who believe that Washington Latin has violated the regulations of Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act, Title VI, Title IX, and/or the Age Act may submit a complaint pursuant to Washington Latin's Grievance Procedures (please see details below).

SCHOOL POLICY AGAINST HARASSMENT

Members of the Washington Latin PCS community have the right to an environment free of discrimination and harassing, coercive or disruptive conduct. Consistent with Washington Latin's respect for the rights and dignity of each employee and community member, any harassment based on race, creed, color, national origin, nationality, ancestry, age, marital status, civil union status, domestic partnership status, affectional or sexual orientation, genetic information, sex (including pregnancy) gender identity or expression, disability or atypical hereditary cellular or blood trait of any individual, liability for service in the Armed Forces of the United States, the refusal to submit to a genetic test or make available the results of a genetic test to an employer, or any other characteristic protected by applicable law (collectively referred to as "Protected Categories") will not be tolerated.

Harassment can be generally defined as verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of his or her Protected Category and that has the purpose or effect of creating an intimidating, hostile, or offensive work environment; or has the purpose or effect of unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment.

This conduct is prohibited in any form at the workplace, at work-related functions or outside of work if it affects the workplace. This policy applies to all employees. The School strictly prohibits and will not tolerate harassment by other members of the School community including but not limited to students, parents, visitors and service providers, vendors or others who have business with or participate in the operations of the School.

Harassment is prohibited in any form at the School, School-related events, or in other instances away from or outside of the School, if it affects the School.

Types of prohibited harassment include, but are not limited to, the following:

- Verbal or written comments related to a trait someone possesses, including name-calling, jokes, slurs, negative stereotyping or threats;
- Explicit or degrading verbal comments about another individual or his or her appearance;
- Nonverbal conduct, such as staring, leering or giving inappropriate gifts;
- Physical conduct, such as assault or unwanted touching; and/or
- Visual images, in hard copy or electronic form, relating to a trait someone possesses (for example, cartoons, drawings or pictures).

Consequences of Harassment

Any individual found to have engaged in sexual or any form of harassment prohibited by this policy will be disciplined as appropriate, up to and including termination.

Reporting Non-Sex-Based Harassment

If you feel that you are being harassed based on a category prohibited by this policy, you are encouraged, but not required, to tell the harasser that his or her actions are not welcome and you want the actions to stop. If you are uncomfortable raising this issue with the harasser, you must bring the harassment to the Head of School, Director of Finance, HR specialist, or if you are more comfortable, you may raise the issue with your direct supervisor.

Further, if you believe that you or another employee has been the subject of sexual harassment or any form of harassment prohibited by this policy, you are required to bring the matter to the attention of any of the following with whom you feel comfortable: Head of School, Director of Finance, HR specialist, or your direct supervisor.

In response to the report of harassment, the School will conduct a prompt and thorough investigation of the alleged incident, and take appropriate corrective action if warranted, which may include interim measures during the period of investigation. To the extent consistent with adequate investigation and appropriate corrective action, Latin will use its best efforts to keep any complaints of harassment confidential.

Washington Latin will not retaliate in any way against employees who, in good faith, make a complaint or report of harassment, or who participate in the investigation of such a complaint or report. Such retaliation is prohibited by law. Retaliation by school employees against any individual for reporting a claim of harassment in good faith or cooperating in the investigation of it will not be tolerated and may subject the retaliating employee to discipline, up to and including termination.

If you believe that you or another employee has been the subject of retaliation as a result of reporting harassment or participation in the investigation, you are required to bring the matter to the attention of any of the following with whom you feel comfortable: Head of School, Director of Finance, HR specialist, or your direct supervisor.

Sexual and Other Harassment

Sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, sexual harassment is defined, as in the Equal Employment Opportunity Commission Guidelines, as unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when, for example a) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; b) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment may include a range of subtle and not-so-subtle behaviors and may involve individuals of the same or different gender. Depending on the circumstances, these behaviors may

include unwanted sexual advances or requests for sexual favors; sexual jokes; verbal abuse of a sexual nature; commentary about an individual's body, sexual prowess or sexual deficiencies; leering, whistling or touching; insulting or obscene comments or gestures; display in the workplace of sexually suggestive objects or pictures; and other physical, verbal or visual conduct of a sexual nature.

Any employee who feels that he or she has been the object of harassment should report the incident directly to the Head of School. If the Head of School is involved in the conduct, then complaints should be made to the Human Resources office (hr@latinpcs.org).

Complaints of sexual harassment will receive prompt attention. It is the School's policy to investigate such complaints thoroughly, promptly, and in an impartial manner. If such an investigation reveals that the complaint is valid, the School will administer disciplinary or other corrective action as appropriate to stop the harassment and prevent its recurrence. Such disciplinary action may include immediate termination of employment. Discipline will be based on the seriousness of the offense. To the fullest extent practicable, the School will use discretion regarding the dissemination of information regarding complaints, related investigations, and the terms of their resolution.

Title IX Coordinator

The School has designated Lawrence Liu as our Title IX Coordinator. As the Title IX Coordinator, Lawrence Liu is responsible for:

- Ensuring compliance with Title IX.
- Overseeing anti-discrimination and harassment training and education.
- Overseeing and coordinating the response, investigation, and resolution of reports made under this Policy.
- Overseeing certain aspects of student discipline, including referring complaints to other personnel in the School as appropriate.

Upon receiving reports of Prohibited Conduct covered by this Policy, the Title IX Coordinator will ensure appropriate action to eliminate the conduct, prevent its recurrence, and remedy its effects. Lawrence Liu may be contacted during regular business hours: lliu@latinpcs.org. Any inquiries concerning the School's application of Title IX and its implementing regulations may be referred to the Coordinator, the Head of School and/or to the Department of Education, Office of Civil Rights:

U.S. Department of Education, Office of Civil Rights
District of Columbia Office
400 Maryland Avenue, SW
Washington, D 20202-1475
Telephone: (202) 453-6020, Fax: (202) 453-6021
Email: OCR.DC@ed.gov

Definitions Related to Title IX Responsibilities

Prohibited Conduct: All forms of sex- or gender-based harassment, discrimination, or violence that may deny or limit a student's ability to participate in or benefit from Washington Latin's education programs or activities or otherwise create a hostile working environment. Prohibited Conduct can include, but is not limited to sexual harassment, sexual assault, and sexual exploitation, as well as harassment based on gender identity, gender expression, and nonconformity with gender stereotypes.

Responsible Employee: Any employee who: has the authority to take action to redress sexual harassment/misconduct; who has been given the duty of reporting incidents of sexual harassment/misconduct or any other misconduct by students to the Coordinator or other appropriate designee; or who a student reasonably believes has this authority or duty.

Sex-Based Discrimination: Discrimination occurs when one experiences negative or adverse conduct based on characteristics protected in this Policy and/or applicable local and federal laws, where such conduct has the effect of denying or limiting one's ability to benefit from and fully participate in educational programs or activities or employment opportunities. Sex-Based Discrimination refers to a specific type of discrimination, which includes the disparate treatment of a person or group because of that person's or group's sex, sexual orientation, actual or perceived gender, gender identity, or gender expression. Sex-Based Discrimination includes conduct such as assigning students materially different assignments based on their actual or perceived sex or gender. It does not include conduct such as requiring students to use different bathrooms.

Harassment: Sexual harassment is unwelcome conduct of a sexual nature, including but not limited to: unwelcome sexual advances; requests for sexual favors; or other verbal or nonverbal conduct of a sexual nature, including rape, sexual assault, and sexual exploitation. Sexual harassment specifically includes conduct of a sexual nature which is either explicitly or implicitly made a term or condition of a student's success in school. Depending on the facts, dating violence, domestic violence, and stalking may also be forms of sexual harassment.

Unwelcome Conduct: Conduct is considered "unwelcome" if the individual did not request or invite it and considered the conduct to be undesirable or offensive. Unwelcome conduct may take various forms, including name-calling, graphic or written statements (including the use of cell phones or the Internet), or other conduct that may be physically threatening, harmful, or humiliating. Unwelcome conduct does not have to include intent to harm, be directed at a specific target, or involve repeated incidents. Unwelcome conduct can involve persons of the same or opposite sex. Participation in the conduct or the failure to complain does not always mean that the conduct was welcome. The fact that a person may have welcomed some conduct does not necessarily mean that a person welcomed other conduct. Also, the fact that a person requested or invited conduct once does not mean that the conduct is welcome on a subsequent occasion.

Hostile Environment: A hostile environment exists when sex-based harassment is sufficiently serious to deny or limit the student's ability to participate in or benefit from the school's programs or activities or is sufficiently severe or pervasive to create a hostile working environment. The more severe the sex-based harassment, the less need there is to show a repetitive series of incidents to find a hostile environment. Indeed, a single instance of sexual assault may be sufficient to create a hostile environment. Likewise, a series of incidents may be sufficient even if the sex-based harassment is not particularly severe.

Consent: Consent must be informed, voluntary, and mutual, and can be withdrawn at any time. There is no consent when there is force, expressed or implied, or when coercion, intimidation, threats, or duress is used. Whether a person has taken advantage of a position of influence over another person may be a factor in determining consent. Silence or absence of resistance does not imply consent. Past consent to sexual activity with another person does not imply ongoing future consent with that person or consent to that same sexual activity with another person. Note that because of the age of the students at Washington Latin and the position of authority that employees hold over students, the School will never consider a student to have consented to sexual contact with any employee.

Non-Consensual Sexual Activity: Includes any sexual contact, however slight, with an object or bodily part, by a person upon another that is without consent.

Incapacitation: Includes, but is not limited to, lack of consciousness, being asleep, being involuntarily restrained, or otherwise being unable to consent. Indicators of incapacitation include slurred speech, bloodshot or unfocused eyes, unsteady gait (needing assistance walking or standing), vomiting, concern expressed by others about the individual, expressed memory loss, or disorientation.

Sexual Assault: Sexual assault is actual or attempted sexual contact with another person without that person's consent. Sexual assault includes, but is not limited to: intentional touching of another person's intimate parts without that person's consent; or other intentional sexual contact with another person without that person's consent; or coercing, forcing, or attempting to coerce or force a person to touch another person's intimate parts without that person's consent.

Sexual Contact: The intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person with an intent to abuse, humiliate, harass, degrade, or arouse or gratify the sexual desire of any person.

Sexual Exploitation: non-consensual sexual abuse or exploitation of another, when such behavior does not otherwise constitute another specifically defined behavior. Examples of sexual exploitation include, but are not limited to, non-consensual use of electronics to capture, reproduce, or share images of a sexual nature without consent of parties involved, public

indecenty, or exposing genitals to others without consent, or engaging in 'peeping' (observing another when privacy would be reasonably expected) without consent.

Reporting Prohibited Conduct

Washington Latin strongly encourages all individuals to seek assistance from a medical provider and/or law enforcement immediately after an incident involving violence, including sexual assault. This is the best option to ensure preservation of evidence and to begin a timely investigative and remedial response.

The School also encourages all individuals to make a report of Prohibited Conduct to both the School and to local law enforcement, although neither is required. These reporting options are not mutually exclusive. Both internal and external reports may be made simultaneously. The procedures under this Policy may run concurrently with any criminal justice or child protection investigation and will only be subject to temporary delays at the specific request of law enforcement. Because the standards for finding a violation of a criminal law are different from the standards articulated in this Policy, criminal investigations or reports or determinations made by child protection officials are not determinative of whether a violation of this policy has occurred.

Filing a Report with the School

Any individual who wishes to report Prohibited Conduct is encouraged to report directly to the Title IX Coordinator or any other Responsible Employee. Reports may be made in person, by telephone, or in writing. Written complaints are encouraged. A complaint may be made on behalf of oneself or on behalf of another employee or student. If a complaint implicates the Title IX Coordinator, or if a Complainant is otherwise uncomfortable bringing their concerns to another Responsible Employee, they may bring their complaint to the Head of School.

Depending on the nature of the complaint, the Head of School may designate another appropriate individual to conduct and/or coordinate a response.

All employees of the School are required to immediately report suspected child abuse and neglect, to the Head of School, who assists in coordinating the appropriate response and fulfilling employees' mandatory reporting obligations. Thus, confidentiality cannot be guaranteed when an individual makes a report to a School employee, including school counselors and the school nurse. Employees who become aware of an alleged Title IX violation, including sexual misconduct, interpersonal violence or sexual harassment or retaliation are required to report it to the Title IX Coordinator.

Requests for Confidentiality and/or Anonymity

Individuals making reports under this policy may request that the Coordinator not reveal their identity to the individual they are accusing of misconduct. If an individual requests this type of confidentiality, the Coordinator will weigh the request against the School's obligation to provide a

safe, non-discriminatory environment for all members of its community. The Coordinator will try to honor these requests, but it is not always possible to do so. Regardless of whether an individual requests confidentiality, the School will make every effort to prevent disclosure of the names of all the parties involved – the reporting individual, the Complainant, the witnesses, and the Respondent – except to the extent necessary to carry out an investigation.

Individuals who wish to remain anonymous can leave an anonymous report with the Title IX Coordinator by providing a written summary of the incident.

Prohibition on Retaliation

Washington Latin will not tolerate retaliation. Retaliation is prohibited by Title IX and this Policy. An individual reporting Prohibited Conduct is entitled to protection from any form of retaliation following a report that is made in good faith, even if the report is later not proven to be true. This Policy also prohibits harassment of Respondents. In addition, retaliation is prohibited against individuals participating in an investigation under this Policy (such as a witness). The School will take immediate and responsive action to any report of retaliation or additional harassment and will pursue disciplinary action as appropriate.

DRUG AND ALCOHOL-FREE WORKPLACE POLICY

The School maintains a strictly smoke-free, alcohol-free, and drug-free environment. There is to be no smoking, use of any tobacco product, including e-cigarettes, alcohol, recreational or prescription drug (including marijuana) in the School buildings, on School grounds, or at School-sponsored events. The only exception is that alcohol may be served at certain adult-only social functions as approved by the Head of School and/or the Board of Governors. The use, possession, manufacture, distribution, purchase and/or sale of alcohol or illegal drugs (which includes controlled substances); the abuse or misuse of legal drugs (including medical marijuana or over-the-counter medication); or being impaired by either drugs (illegal or legal) or alcohol during school hours, on school property, on school business, or at school events is prohibited and may result in termination.

The prohibition against tobacco, alcohol and drug use, always, is applicable to students, all school staff, parents, and visitors on school property, in school vehicles, and at school sponsored functions on or away from school property. The sidewalks surrounding the school grounds are also off limits for the use of prohibited substances.

The school takes its commitment to health and wellness seriously. Violation of this policy may result in immediate termination.

Nothing in this policy precludes the appropriate use of any prescribed medications. However, reporting for work impaired by any prescribed or abusive use of a prescription medication, including but not limited to medical marijuana, is strictly prohibited. Any employee taking prescribed medications which may impair her/his ability to work, for whatever reason, should inform her/his supervisor as soon as possible.

At the occasional school-sponsored event where alcoholic beverages are served, you are expected to conduct yourself in an appropriate manner. If you are performing assigned responsibilities at such functions, *you are prohibited from consuming alcoholic beverages.*

Any employee about whom there is a reasonable suspicion of violating the School's drug-free workplace policy may be required to submit to drug and/or alcohol testing. Employees responsible for any means of school transportation will be required to submit to random drug and/or alcohol testing. Candidates for employment may be asked to submit to alcohol, drug and controlled substance testing prior to hiring or any time during their employment with the School. Employees who fail a drug test either prior to hiring or any time during their employment with the School may be terminated for cause from the School.

GRIEVANCE PROCEDURE - FILING A FORMAL FACULTY OR STAFF COMPLAINT

While all Washington Latin employees strive to work in a collegial and forthright manner with each other, there may be occasions when issues or concerns arise for which resolution is needed. In such cases the Washington Latin employee shall follow the procedure described below for addressing those concerns.

1. Speak directly to the party or parties in question. The employee may ask another employee to join him/her in a discussion with the other party.
2. If this step does not successfully address the issue, the employee should bring the concern to his/her immediate supervisor.
3. If the concern cannot be resolved with the help of one's supervisor, the employee and the supervisor will write a letter to the Principal, which outlines the issue(s) and provides background about steps taken thus far. The Principal will then meet with the parties, accompanied by their respective supervisors, in an effort to resolve the conflict. Minutes of that meeting will be kept and distributed to the affected parties and their supervisors.
4. Should step 3 not result in satisfactory resolution of the concern, the employee may appeal in writing to the Head of School. The appeal should clearly summarize the issues of concern and the minutes from the meeting with the Principal should be included. The Head of School shall then establish an Assessment Meeting. The format and attendees of that Assessment Meeting shall be determined by the Head of School. The Head of School will be the final arbiter of the issue and no further appeal shall be available. The concerned employee and attendees shall receive written notice of the Head of School's decision after the Assessment Meeting in a timely manner.

Each step in the above process is established to permit each employee to openly share concerns in a cooperative environment while attempting to resolve conflicts in as comfortable and speedy a manner as possible.

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.

Washington Latin 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.

Washington Latin prohibits retaliation against individuals who file a complaint or participate in a complaint investigation.

A formal complaint, including if any person believes that Washington Latin has violated the regulations of Section 504 of the Rehabilitation Act of 1973, the Americans with Disabilities Act, Title VI, Title IX, and/or the Age Act, may be filed by following the steps outlined below:

Step 1

Within ninety (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, because of the investigation, it is determined that discrimination or harassment have occurred, appropriate corrective and remedial action will be taken.

Step 2

If the complainant wishes to appeal the decision from Step 1, he/she may submit a signed statement of appeal to the Head of School within ten (10) business days after receipt of the response. The Head of School 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 Head of School will respond in writing to the complainant summarizing the outcome of the appeal and any corrective or remedial action to be taken.

Step 3

If the complainant is not satisfied with the decision of the Head of School, he/she may appeal through a signed written statement to the school Board of Governors within ten (10) business days of the receipt of the Head of School'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.

The complainant may file a complaint with the Office for Civil Rights (address on page 6) at any time before or during the grievance procedures.

WHISTLEBLOWER PROTECTION POLICY

Washington Latin Public Charter School (“WLPCS”) is committed to operating in furtherance of its tax-exempt purposes and in compliance with all applicable laws, rules and regulations, including those concerning accounting practices, internal controls and auditing. To that end, WLPCS strictly prohibits fraudulent practices, and requires its governors, officers, employees, and volunteers to observe high standards of business and personal ethics in the conduct of their duties and responsibilities.

This Whistleblower Protection Policy (the “Policy”) outlines a procedure for employees to report actions that an employee, acting in good faith, has reasonable grounds to believe violate any applicable laws, rules, or regulations, including conduct that constitutes fraudulent accounting, auditing or other practices. This policy applies to any matter which is related to WLPCS’s business and does not relate to private acts of an individual not connected to the business of WLPCS.

It is the responsibility of all WLPCS employees to promptly report suspected violations of any applicable laws, rules, or regulations, including those concerning accounting practices, internal controls or auditing, in accordance with this Policy. If an employee, acting in good faith, has reasonable grounds to believe that a WLPCS governor, officer, employee, or volunteer has engaged in conduct that violates any applicable laws, rules or regulations, the employee is expected to share his or her questions, concerns, suggestions, or complaints with someone who can address them properly. In most cases, an employee’s supervisor is in the best position to address an area of concern.

Supervisors and managers are required to report suspected violations to WLPCS’s Director of Operations. If an employee is not comfortable speaking with his or her supervisor or is not satisfied with the supervisor’s response, employees are encouraged to report suspected violations directly to WLPCS’s Compliance Officer and/or the Head of School. If the employee does not feel comfortable reporting the information to the Head of School, he or she is expected to report the information to the Chair of the Audit Committee of the Board of Governors if the matter relates to a financial issue and to the President of the Board of Governors for all other matters.

The Compliance Officer will promptly acknowledge receipt of any reported violation. All reports will be promptly investigated by the Compliance Officer and appropriate action will be taken, including, at the Compliance Officer’s discretion, advising the Board of Governors and/or the audit committee. In conducting its investigations, WLPCS will keep the identity of the complaining individual confidential to the extent possible, while conducting an adequate review and investigation.

No WLPCS governor, officer, or employee who in good faith reports a suspected violation shall suffer harassment, retaliation or any adverse employment consequences. Specifically, WLPCS will not retaliate against an employee in the terms and conditions of employment because that employee:

- (a) Reports to a supervisor, the Compliance Officer, the Head of School, the Board of Governors or a federal, state or local agency his or her good faith suspicion that a violation of any applicable laws, rules or regulations occurred;
- (b) Participates in good faith in any resulting investigation or proceeding, including providing to law enforcement personnel or a court truthful information relating to the suspected violation of an applicable law, rule or regulation; or
- (c) Exercises his or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee's rights.

WLPCS may take disciplinary action (up to and including termination) against an employee who, in management's assessment, has engaged in retaliatory conduct in violation of this Policy. Supervisors will be trained on this policy and WLPCS's prohibition against retaliation in accordance with this Policy.