



### Drug-Free and Alcohol-Free Workplace

To help ensure a safe, healthy and productive work environment for our employees and others, to protect Organization property, and to ensure efficient operations, Center City PCS has adopted a policy of maintaining a workplace free of drugs and alcohol. This policy applies to all employees and other individuals who perform work for the Organization.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale or distribution of controlled substances, drug paraphernalia or alcohol by an individual anywhere on Organization premises, while on Organization business (whether or not on Organization premises) or while representing the Organization, is strictly prohibited. Employees and other individuals who work for Center City PCS also are prohibited from reporting to work or working while they are using or under the influence of alcohol or any controlled substances, which may impact an employee's ability to perform his or her job or otherwise pose safety concerns, except when the use is pursuant to a licensed medical practitioner's instructions and the licensed medical practitioner authorized the employee or individual to report to work. However, this does not extend any right to report to work under the influence of medical marijuana or to use medical marijuana as a defense to a positive drug test, to the extent an employee is subject to any drug testing requirement, to the extent permitted by and in accordance with applicable law. This restriction does not apply to responsible drinking of alcohol at business meetings and related social outings. Violation of this policy will result in disciplinary action, up to and including discharge.

The Organization maintains a policy of non-discrimination and will endeavor to make reasonable accommodations to assist individuals recovering from substance and alcohol dependencies, and those who have a medical history that reflects treatment for substance abuse conditions. However, employees may not request an accommodation to avoid discipline for a policy violation. We encourage employees to seek assistance before their substance abuse or alcohol misuse renders them unable to perform the essential functions of their jobs or jeopardizes the health and safety of any Organization employee, including themselves.

Employees must notify the Organization within five calendar days if they are convicted of a criminal drug violation in the workplace. Within ten (10) calendar days of such notification or other actual notice, the Organization will advise the contracting agency of such conviction. All employees are hereby advised that full compliance with the foregoing policy shall be a condition of employment at the Organization.



Any employee who violates the foregoing drug-free workplace policy described above shall be subject to discipline up to and including immediate discharge.

In the discretion of the Organization, any employee who violates the drug-free workplace policy may be required, in connection with or in lieu of disciplinary sanctions, to participate to the Organization's satisfaction in an approved drug assistance or rehabilitation program.

In order to maintain a drug-free workplace, the Organization has established a drug-free awareness program to educate employees on the dangers of drug abuse in the workplace, our drug-free workplace policy, the availability of any drug-free counseling, rehabilitation and employee assistance programs and the penalties that may be imposed for violations of our drug-free workplace policy.

Such education may include: (1) distribution of our drug-free workplace policy at the employment interview; (2) a discussion of our policy at the new employee orientation session; (3) distribution of a list of approved drug assistance agencies, organizations and clinics; (4) distribution of published educational materials regarding the dangers of drug abuse; (5) reorientation of all involved employees in cases in which a drug-related accident or incident occurs; (6) inclusion of the policy in employee handbooks and any other personnel policy publications; (7) lectures or training by local drug abuse assistance experts; (8) discussion by the Organization's safety experts on the hazards associated with drug abuse; and (9) video tape presentations on the hazards of drug abuse.



### Equal Employment Opportunity Policy

Center City PCS is an Equal Opportunity Employer that does not discriminate on the basis of actual or perceived race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, disability or handicap, sex, marital status, veteran status, sexual orientation, genetic information, arrest record, or any other characteristic protected by applicable federal, state or local laws. Our management team is dedicated to this policy with respect to recruitment, hiring, placement, promotion, transfer, training, compensation, benefits, employee activities and general treatment during employment.

Center City PCS is committed to providing equal opportunity in employment to qualified individuals with disabilities in accordance with the Americans with Disabilities Act of 1990 (ADA) and the District of Columbia Human Rights Act (DCHRA).

Center City will endeavor to make a reasonable accommodation to the known physical or mental limitations of qualified employees with disabilities unless the accommodation would impose an undue hardship on the operation of our business. If you need assistance to perform your job duties because of a physical or mental condition, please inform the Director of Operations.

Employees with disabilities who believe that they need an accommodation to perform their job should inform their Principal and email Human Resources at [hr@centercitypcs.org](mailto:hr@centercitypcs.org) of the disability and suggest, on a confidential basis, how Center City PCS may reasonably accommodate them. Center City PCS may require medical confirmation (either from the employee's healthcare provider or a healthcare provider chosen by Center City PCS) in evaluating the employee's condition, applicable work limitations, and potential accommodations as a part of this process. Center City PCS will keep medical information confidential and will treat employees with a disability in a manner consistent with the treatment of others.

Details regarding Title I of the Americans with Disabilities Act of 1990 (ADA) may be found here: <http://www.eeoc.gov/laws/statutes/ada.cfm>. Information regarding the DCHRA can be found at: <http://ohr.dc.gov/>

The Organization will endeavor to accommodate the sincere religious beliefs of its employees to the extent such accommodation does not pose an undue hardship on the Organization's operations. If you wish to request such an accommodation, please speak to your Principal and contact the Director of Operations at [hr@centercitypcs.org](mailto:hr@centercitypcs.org).



Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the Director of Operations. The Organization will not allow any form of retaliation against individuals who raise issues of equal employment opportunity. If an employee feels he or she has been subjected to any such retaliation, he or she should bring it to the attention of the Director of Operations. To ensure our workplace is free of artificial barriers, violation of this policy including any improper retaliatory conduct will lead to discipline, up to and including discharge. All employees must cooperate with all investigations.



## Sexual Harassment Policy

It is Center City Public Charter Schools' policy to prohibit harassment of any employee by any Supervisor, employee, customer or vendor on the basis of sex or gender. The purpose of this policy is not to regulate personal morality within the Organization. It is to ensure that at the Organization all employees are free from sexual harassment.

While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-mails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, or teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

If the employee feels that he or she has been subjected to conduct which violates this policy, the employee should immediately report the matter to Human Resources at [hr@centercitypcs.org](mailto:hr@centercitypcs.org). If the employee has not received a satisfactory response within five (5) business days after reporting any incident of perceived harassment, the employee should contact the Director of Operations. If the person toward whom the complaint is directed is one of the individuals indicated above, the employee should contact any higher-level manager in his or her reporting hierarchy. Every report of perceived harassment will be fully investigated and corrective action will be taken where appropriate.

All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. In addition, the Organization will not allow any form of retaliation against individuals who report unwelcome conduct to management or who cooperate in the investigations of such reports in accordance with this policy. If an employee feels that he or she has been subjected to any such retaliation, the employee should report it in the same manner in which a claim of perceived harassment would be reported under this policy. Violation of this policy, including any improper retaliatory conduct will result in disciplinary action, up to and including discharge. All employees must cooperate with all investigations.



### Problem Solving/Grievance Policy

Center City PCS is committed to providing the best working conditions for its employees. As such, the organization encourages a frank and open atmosphere in which any problem, suggestion, or question can be reported and addressed. Center City PCS cannot address employee concerns or questions without input from employees on what can be done to help. Employees who believe that they have been treated unfairly have recourse for resolution of their grievance.

Center City PCS values discussions and open communication in resolving any concern or grievance and will make every effort to address the situation in a method that preserves good will between the School, parents/guardians, students, employees, volunteers, vendors and other visitors. Accordingly, the following grievance procedures should be employed to ensure that complaints receive full consideration.

Employees may bring complaints pertaining to educational issues, employment arrangements or interpersonal conflicts.

The existence of this procedure does not bar the grieved from also filing claims in other forums or otherwise exercising their rights to the extent permitted by District of Columbia or federal law.

### Filing of Complaints and Grievances

From time to time in the workplace, disputes or misunderstandings occur. These are considered informal complaints. Center City PCS pledges to make every effort possible to resolve any concern or grievance made to Center City PCS without the need for filing a formal complaint. Because Center City PCS truly believes that most difficulties can be resolved by communicating any concern or grievance to the School directly, employees are strongly encouraged to discuss their grievance promptly and candidly with their supervisor first. If a complaint is about a supervisor or if an employee is not comfortable discussing it with their supervisor, the employee may discuss it with Human Resources ([hr@centercitypcs.org](mailto:hr@centercitypcs.org)). To protect your confidentiality and ensure the appropriate party addresses your concerns, staff should not send emails to individual personnel.

Employees are not required to discuss a complaint with an alleged perpetrator in any manner or for any reason prior to initiating a formal grievance. A formal grievance is one that would impact an employee's ability to do his/her job or is contrary to an established policy.

Employees who would like to file a formal grievance should complete the Employee Grievance Form and submit it to their supervisor or Human Resources via [hr@centercitypcs.org](mailto:hr@centercitypcs.org) within 30



calendar days of encountering the concern or grievance that is the subject of the complaint. Human Resources will only consider grievances filed using this form as formal grievances. Within 30 calendar days after submitting the form, the employee who has filed a complaint can expect a written response from the Center City PCS Human Resources team summarizing the course of the investigation, issues raised in the grievance, findings, conclusions, and remedies to be provided if any. If wrongdoing is established as a result of the investigation, corrective action will be taken immediately.

**Appeals:** Employees who are not satisfied with the response to their formal grievance may appeal in writing to the President & CEO within 15 business days of receiving Center City PCS's response. Employees must include in their appeal all written documentation from the initial written formal grievance as well as their reasons for not accepting the response. Within 15 business days from receiving the written appeal, Center City PCS's President & CEO will respond in writing with the action to be taken and the reasons for that action.

**Prohibition Against Reprisal:** Center City PCS pledges that it will not take an adverse action against employees because they have filed a formal grievance in accordance with this policy, or any person who participates in the proceedings related to this policy.

**Modification:** Center City PCS may modify the foregoing procedures in a particular case with notice to the grievant if the modification is consistent with ensuring Center City PCS has sufficient information to respond to the formal grievance, and/or the policies of Center City PCS.

The procedures set forth in this Problem Solving/Grievance Policy do not apply to perceived incidents of discrimination, harassment, or retaliation. All complaints of discrimination, harassment, and retaliation must be reported to your direct supervisor, Human Resources or any other member of management, and will be investigated in accordance with the procedures set forth in Center City PCS's Policy Against Workplace Discrimination & Retaliation.



### Whistleblower Policy

Center City PCS complies with all applicable federal and District of Columbia government contracting requirements. It is the intent of Center City PCS to adhere to all laws and regulations that apply to the organization, and the underlying purpose of this policy is to support Center City PCS's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations.

Center City PCS thus encourages employees to report internally any concerns so it will have a reasonable opportunity to investigate and correct the alleged unlawful activity promptly. An employee is protected from retaliation if the employee, acting in good faith, brings the alleged unlawful activity, policy, or practice to the attention of Center City PCS.

Furthermore, Center City PCS is committed to high standards of ethical and moral business conduct. In line with this commitment and Center City PCS's commitment to open communication, this policy aims to provide an avenue for employees to raise concerns and ensure that they will be protected from retaliation or victimization for reporting possible unethical or immoral conduct.

This whistleblowing policy is intended to provide protections for employees if they should raise concerns regarding the conduct of Center City PCS employees, administrators and Board members, such as:

- Incorrect financial reporting;
- Failure to follow Center City PCS's procurement guidelines;
- Cheating on standardized tests;
- Making misrepresentations to the District of Columbia Public Charter School Board;
- Conflicts of interest;
- Unlawful activity;
- Activities that are not in line with Center City PCS policy, including the Standards of Conduct;
- Activities that otherwise amount to serious improper conduct or could result in Center City PCS being perceived in a negative light.

Moreover, all employees should be aware that they will not be subjected to any adverse and/or retaliatory action as a result of reporting any conduct believed to be in violation of the Policy Against Workplace Discrimination & Retaliation. Center City PCS's procedure for resolving complaints is available to all employees without fear of retaliation. Center City PCS will not take action against any employee because he or she makes a good faith report of inappropriate conduct.

Center City PCS also will not retaliate against any employee who is a close associate of a person who objects to perceived discrimination or harassment. An employee who believes that retaliation has resulted from the reporting of prohibited conduct must immediately report this in the manner set forth above. An employee who has a concern or problem should not assume that Center City PCS is aware of it. It is every employee's responsibility to bring complaints and concerns to Center City PCS's attention so that leadership can help resolve them.