



## **Non-Discrimination and Anti-Harrassment Policy**

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”), Girls Global Academy does not discriminate on the basis of race, color, national origin, ancestry, genetic information, sex, disability, age, religion, marital status, military status, personal appearance, sexual orientation, gender identity or expression, familial status, pregnancy, childbirth or related medical conditions (such as pregnancy or breastfeeding), family responsibilities, political affiliation, matriculation, source of income, or any other legally-protected status of an individual or group.

### **Harassment Policy**

#### **Workplace Harassment**

GGA is committed to providing a work environment that provides employees equality, respect and dignity. In keeping with this commitment, GGA has adopted a policy of “zero tolerance” with regard to employee harassment. Harassment includes unsolicited and unwelcome contact or behavior directed at an employee’s race, color, national origin, ancestry, genetic information, sex, disability, age, religion, marital status, military status, personal appearance, sexual orientation, gender identity or expression, familial status, pregnancy, childbirth or related medical conditions (such as pregnancy or breastfeeding), family responsibilities, political affiliation, matriculation, source of income, or any other legally-protected status of an individual or group. Harassment of employees by coworkers, students, families, volunteers, contractors, vendors or other persons, whether at work or outside of work, will not be tolerated. GGA will make every reasonable effort to ensure that its entire community is familiar with this policy and that all employees are aware that every complaint received will be investigated thoroughly and promptly.

#### **Sexual Harassment**

Sexual harassment is prohibited by federal and local laws, and applies regardless of gender identity or expression. Sexual harassment includes: unwelcome sexual advances, requests for sexual favor(s), or other verbal or physical conduct of a sexual nature when (1) submission to the conduct is made either explicitly or implicitly a term or condition of an employee’s employment; (2) submission to or rejection of such conduct by an employee is used as the basis for employment decisions affecting the employee; or (3) such conduct has the purpose or effect of unreasonably interfering with an employee’s work performance or creating an intimidating, hostile or offensive working environment.

Examples of sexual harassment are: subtle or overt pressure for sexual favors; inappropriate

touching; lewd, sexually oriented comments or jokes; foul or obscene language; posting of suggestive or sexually explicit posters, calendars, photographs, graffiti, or cartoons; and repeated requests for dates. GGA policy further prohibits harassment and discrimination based on sex stereotyping. (Sex stereotyping occurs when one person perceives a man to be unduly effeminate or a woman to be unduly masculine and harasses or discriminates against that person because he or she does not fit the stereotype of being male or female.) GGA encourages reporting of all perceived incidents of sexual harassment, regardless of who the offender may be. Every employee is encouraged to raise any questions or concerns with the Human Resources Department.

### **Supervisors' Responsibilities To Prevent Harassment**

All supervisors and managers are expected to ensure a work environment free from sexual and other harassment based on protected categories. They are responsible for the application and communication of this policy within their work area. Supervisors and managers should:

- Encourage employees to report any violations of this policy.
- Make sure the Human Resources Department is made aware of any inappropriate behavior in the workplace.
- Create a work environment where sexual harassment and other harassment based on protected categories is not permitted.

### **Discrimination and Harassment Complaint Procedure**

*Reporting:* Girls Global Academy encourages reporting of all incidents of discrimination or sexual or other unlawful harassment, regardless of the identity of the offender. If you feel that you are or have been the victim of illegal discrimination or sexual or other unlawful harassment in violation of our policy, you should immediately notify the immediate supervisor. If the employee does not feel their supervisor has effectively managed their complaint, then the employee can contact the Executive Director or the Board of Trustees.

Your complaint does not need to be in writing for us to begin our investigation, but the person to whom you make your complaint may ask you to describe the incident in writing.

*Investigating:* Girls Global Academy will fully investigate all discrimination and harassment complaints. In our investigation, we will seek to treat the matter as confidentially as possible, but we cannot promise complete confidentiality. The investigation may include individual interviews with the parties involved and, where necessary, with witnesses or others with relevant knowledge. Every report of harassment or discrimination will be investigated promptly and thoroughly.

*Responsive Action:* Any employee of Girls Global Academy who has been found to have violated this policy shall be subject to appropriate disciplinary action, up to and including discharge. If your complaint of discrimination is substantiated, Girls Global Academy will take appropriate remedial action.

*No Retaliation:* If you report discrimination or harassment or you participate in investigations

under this policy, you should not experience any kind of retaliation or reprisal for such participation. If you feel that you have suffered retaliation for reporting harassment or discrimination or for participating in an investigation, please file a complaint using the procedures described above.

## **Equal Employment Opportunity and Anti-Discrimination Policy**

Girls Global Academy is an Equal Opportunity Employer, and is committed to providing equal employment opportunity in recruitment, hiring, training and development, promotion, termination, compensation, benefits, and all other terms, conditions, and privileges of employment as required by applicable law.

GGA is an equal opportunity employer and makes all employment decisions without regard to race, religion, color, sex (including pregnancy), national origin, disability, age, genetic information, marital status, personal appearance, sexual orientation, ancestry, gender identity or expression, family responsibilities, political affiliation, military/veteran status, source of income, immigration status (except as necessary to comply with federal, state, or local law, physical or mental disability, medical condition, or any other category protected by applicable federal, state, or local law.

GGA makes decisions concerning employment based strictly on an individual's qualifications and ability to perform the job under consideration, the comparative qualifications and abilities of other applicants or employees, and the individual's past performance within the organization.

If you believe that an employment decision has been made that does not conform with management's commitment to equal opportunity, you should promptly bring the matter to the attention of the Human Resources Department. Your complaint will be thoroughly investigated. There will be no retaliation against any employee who files a complaint in good faith, even if the result of the investigation produces insufficient evidence to support the complaint.

## **Drug, Alcohol, and Substance Abuse**

Girls Global Academy has a vital interest in maintaining a safe and efficient working environment. Employees who work while under the influence of drugs or alcohol present a safety hazard to children, co-workers, and themselves. Working under the influence of drugs or alcohol limits your ability to perform and provide required services. Accordingly, Girls Global Academy is committed to maintaining a drug-free environment and will strictly enforce anti-substance abuse policies.

The following are strictly prohibited:

- Possession, transfer, sale, distribution, use, or solicitation of illegal drugs on Girls Global Academy grounds and facilities (including the parking lot and adjacent areas).

- Possession or use of alcohol during Girls Global Academy operational hours in Girls Global Academy facilities, apart from at approved staff events.
- Reporting to work or being present at work while intoxicated or impaired by alcohol or drugs.
- Abuse of prescription drugs: Prescribed drugs will be allowed only when taken in accordance with an official physician's prescription, and where such use will not adversely affect your ability to properly and safely perform your duties. If you are taking prescription drugs that may affect your ability to perform your assigned tasks properly and safely, including, but not limited to, medically prescribed marijuana, you should inform your supervisor before or immediately upon return to work. Abuse of prescribed drugs will not be tolerated and will be treated in the same fashion as the use of any illegal drugs.

## **Staff and Third Party Dispute Resolution Policy and Procedure**

### **Dispute Resolution**

GGA has options for employees when a dispute in the workplace occurs. Our goal is to bring an efficient and prompt resolution to a complaint or conflict between employees or between the employee and employer. Examples of a dispute that may be include disputes on work assignments, inconsistent application of policy and procedures, perceived disrespect, expense reimbursement. Alternative dispute resolutions provide the opportunity for all parties to address the problem in a constructive, non-traditional legal route and are less costly for all parties.

In a perfect world, every employment relationship would be smooth and harmonious. However, there are, unfortunately, times when employees and employers disagree. These disagreements often arise in the context of involuntary employment termination, but there may be disagreements regarding the right to a promotion, expense reimbursement, or their things.

### **Work-Related Concerns**

Girls Global Academy is committed to providing the best possible working conditions for its employees. Part of this commitment is encouraging an open atmosphere in which any problem, complaint, suggestion or question receives a timely response from School administrators.

GGA strives to ensure fair and honest treatment of all employees, who are expected to treat each other with mutual respect. Employees are encouraged to offer positive and constructive criticism.

If an employee disagrees with established rules of conduct, policies or practices, he or she may express his or her concerns through the following problem resolution procedure. No employee will be penalized, formally or informally, for voicing a complaint with the School in a reasonable, business-like manner or for using the problem resolution procedure discussed below.

## **Employee Relations Resolution Procedure**

Girls Global Academy strongly encourages all employees to attempt to resolve their workplace differences or disagreements with their coworkers or supervisors. We aim to empower our staff to be self-advocates and hope they feel comfortable and safe in voicing and addressing their problems. However, if an employee believes they need further support to resolve their conflict, GGA has outlined the proper steps below to engage our assistance. Employees have the right to discontinue the procedure at any step and may retract their submission at any time.

1. Submit your concern via this [Employee Relations Intake Form](#), ideally within 10 business days after the incident occurs. Our Human Resources Business Partner (HRBP) will send an acknowledgement email within two (2) business days.
2. Upon review of your submission, the HRBP will contact you through the provided email on the form after five (5) business days from the date of receipt to schedule a discussion meeting. If the matter has been marked urgent, the HRBP will be in contact within three (3) business days from the date of receipt for a discussion.
3. After the HRBP has spoken to the grievant, a copy of the complaint will be provided to the other party to establish a mediation meeting among all involved parties. Upon the grievant's request, this formal meeting can be held separately, and depending on the circumstances, the confidentiality of the grievant can be maintained.
4. If necessary, an investigation will be conducted to uncover certain facts and details about the situation, including the involvement of any named witnesses or other parties privy to the nature of the concern.
5. Upon conclusion of the mediation meeting(s) and investigation, a formal recommendation and/or resolution will be presented to both parties by the HRBP and their relevant supervisors. For urgent matters, this step shall take place within ten (10) business days from the initial filing date. For matters proceeding through the normal process, this step shall take place within thirty (30) days from the initial filing date.
6. In the event the grievant is not satisfied with the recommendation or resolution of their matter, they may file an appeal with the Executive Director for further review and consideration. If the situation involves the Executive Director, the communication should be directed to another key administrator, such as the Chair of the Board of Trustees - at [board@girlsglobalacademy.org](mailto:board@girlsglobalacademy.org)

Not every problem can be resolved to everyone's total satisfaction, but only through understanding and discussion of mutual problems can employees and administration develop confidence in each other. This confidence is important to the operation of an efficient, harmonious work environment.

## **Contact Information for Department of Employment Services**

It is important that GGA employees feel comfortable about contacting anyone on the leadership

team or in the Human Resources Department about any concerns regarding safety, wage and hour issues, or discrimination. However, if you are not comfortable, the Department of Employment Services, specifically the Office of Wage-Hour (OWH), is to be contacted as that office is the designated enforcement agency for the concerns about safety, wage and hour, or discrimination. The OWH can be contacted at 202-671-1880 or via e-mail at [owh.ask@dc.gov](mailto:owh.ask@dc.gov). The office is located at 4058 Minnesota Avenue, NE, Suite 4300 Washington, D.C. 20019. The office is open Monday –Thursday 8:30-4:30 and Friday 9:30-4:30.

### **Discrimination Complaint Procedure**

Any person who believes that Girls Global Academy has discriminated on the basis of race, color, national origin, sex, disability, age, religion, marital status, personal appearance, sexual orientation, gender identity or expression, familial status, family responsibilities, political affiliation, source of income, or otherwise may submit a complaint to the designated individuals below.

Complaints may be submitted to:

Human Resources  
Girls Global Academy Public Charter School  
733 8th Street NW  
Washington, DC 20001  
202-600-4822

The conflict resolution procedures outlined below establish how all complaints will be investigated and resolved. These procedures are intended to provide for a prompt and equitable resolution of complaints and do not bar individuals from filing claims in other forums to the extent permitted by state or federal law.

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

Girls Global Academy will not retaliate against any person who files a complaint or participates in an investigation in accordance with these procedures.

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

#### **Step 1**

Within 90 days of the alleged discrimination or harassment, written notice of the complaint must be filed with the individual designated above. If the complaint is being made against the designated individual above, the complaint can be submitted directly to the individual identified in Step 2, who will designate an appropriate individual to investigate the complaint. The written notice must include the nature of the complaint, the date(s) of the occurrence, the desired result, and must be signed and dated by the

person making the complaint.

Upon receipt of the written notice of the complaint, the designated individual to whom the complaint was submitted will immediately initiate an adequate, reliable and impartial investigation of the complaint. Each investigation will include, as necessary, interviewing witnesses, obtaining documents and allowing parties to present evidence. All documentation related to the investigation will remain confidential.

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

## **Step 2**

If the complainant wishes to appeal the decision from Step 1, he/she may submit a signed statement of appeal to the Karen Venable-Croft, Executive Director of Girls Global Academy 733 8th Street NW Washington, DC 20001 or [info@girlsglobalacademy.org](mailto:info@girlsglobalacademy.org), within ten (10) business days after receipt of the response. If the complaint is being made against the Executive Director, the appeal can be submitted to, Board Chair Girls Global Academy 733 8th Street NW Washington, DC 20001 or [board@girlsglobalacademy.org](mailto:board@girlsglobalacademy.org) who will designate an appropriate individual to address the appeal. The Executive Director, or designee, will review all relevant information and meet with the parties involved, as necessary. Within twenty-one (21) business days of receiving the statement of appeal, the Executive Director, or designee, 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 Executive Director he/she may appeal through a signed written statement to the school Board of Trustees within ten (10) business days of the receipt of the Executive Director's response. A statement of appeal to the Board may be submitted to the Girls Global Academy Board of Trustees Board Chair [board@girlsglobalacademy.org](mailto:board@girlsglobalacademy.org) who will provide the statement to the Board. 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.

Complaints involving students who attend Girls Global Academy may be submitted to:

Molly Green, Special Education Coordinator  
Girls Global Academy Public Charter School  
733 8th Street NW  
Washington, DC 20001  
(202) 600-4822 ext 325

*Grievants also have the right to file a complaint with the Office for Civil Rights by: (1) mailing the complaint to Director, District of Columbia Office, Office for Civil Rights (OCR), U.S. Department of Education, 400 Maryland Avenue, SW, Washington, D.C. 20202-1475; (2) faxing it to (202) 453-6021; or (3) filing it electronically at: [www.ed.gov/ocr/complaintprocess.html](http://www.ed.gov/ocr/complaintprocess.html). For more information, you can contact OCR at (202) 453-6020 (voice), (877) 521-2172 (TDD), or [ocr.dc@ed.gov](mailto:ocr.dc@ed.gov).*

Complaints involving employees of Girls Global Academy may be submitted to:

Human Resources Department  
[Employee Relations Intake Form](#)

Complaints involving Title IX of Girls Global Academy may be submitted to:

Iesha Caisey, Assistant Principal of Culture and Counseling  
Girls Global Academy Public Charter School  
733 8th Street NW  
Washington, DC 20001

*\*Contact the Executive Director (contact information provided above) to reach additional contacts, particularly for Special Education Title IX.*

### **Whistleblower Policy**

This policy is intended to encourage and enable all employees, and others, to raise serious concerns within GGA regarding conflicts of interest, fraud, harassment and retaliation prior to seeking resolution outside of GGA. Reports can be submitted anonymously. However, GGA's ability to investigate may be limited. Reports will be kept confidential to the extent possible consistent with the need to investigate the report. No director, officer, or employee who, in good faith, reports a violation shall experience harassment, retaliation, or adverse employment consequences. An employee who retaliates against someone who reports a violation in good faith, is subject to disciplinary action, up to and including termination.

If you are uncomfortable speaking with an immediate supervisor, or are not satisfied with the supervisor/manager's response, please speak with the Executive Director and anyone in the



administration with whom you feel comfortable speaking with. Supervisors and managers are required to report suspected violations of the Code of Conduct to the Executive Director who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud by supervisors, managers or staff, or when employees are not satisfied or uncomfortable with speaking with any supervisor or manager of GGA, he/she should contact the Chair of the Board.

Anyone filing a complaint under this policy, must be acting in good faith and must have reasonable grounds for believing the disclosed information relates to potential misconduct. Any allegations which are not substantiated, and which prove to have been made with malicious intent or made knowing the accusation is false, will be subject to disciplinary action, up to and including termination.