



## Sexual Harassment Policy

It is Howard University Middle School of Mathematics and Science's 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 Middle School. It is to ensure that at the Middle School 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 the Head of Human Resources. If unable for any reason to contact this person, or 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 Executive Director. 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 Middle School 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.



## Drug-Free and Alcohol-Free Workplace Policy

To help ensure a safe, healthy and productive work environment for our employees and others, to protect Middle School property, and to ensure efficient operations, the Middle School 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 Middle School.

The unlawful or unauthorized use, abuse, solicitation, theft, possession, transfer, purchase, sale or distribution of controlled substances, including but not limited to marijuana, drug paraphernalia or alcohol by an individual anywhere on Middle School premises, while on Middle School business (whether or not on Middle School premises) or while representing the Middle School, is strictly prohibited. Employees and other individuals who work for the Middle School 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.

Violation of this policy will result in disciplinary action, up to and including discharge.

The Middle School 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 which 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 Middle School employee, including themselves.

Employees must notify the Middle School within five calendar days if they are convicted of a criminal drug violation in the workplace. Within ten (10) days of such notification or other actual notice, the Middle School 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 Middle School.

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



## Equal Employment Opportunity Policy

Howard University Middle School of Mathematics and Science 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.

The Middle School 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 let the Head of Human Resources know.

The Middle School will endeavor to accommodate the sincere religious beliefs of its employees to the extent such accommodation does not pose an undue hardship on the Middle School's operations. If you wish to request such an accommodation, please speak to the Head of Human Resources.

Any employees with questions or concerns about equal employment opportunities in the workplace are encouraged to bring these issues to the attention of the Head of Human Resources. The Middle School 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 Head of Human Resources. 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



## Staff Complaint Resolution Policy

It is the policy of Howard University Middle School of Mathematics and Science that all employees, students, parents, and visitors have the right to voice their complaints or grievances about matters pertaining to its school.

Howard University Middle School of Mathematics and Science recognizes the meaningful value and importance of full discussion in resolving misunderstandings and in preserving good relations between all (MS)2 stakeholders. Accordingly, the following grievance procedure should be employed to ensure that complaints receive full consideration.

1. WHAT MAY BE GRIEVED

Howard University Middle School of Mathematics and Science's grievance process should be used as follows (1) to deal with complaints and concerns pertaining to the educational environment, employment arrangements, or interpersonal conflicts; and (2) to resolve complaints of discrimination and harassment based upon race, color, religion, creed, sex, national origin, age, disability, veteran status, sexual orientation, or otherwise.

2. WHO MAY GRIEVE

The procedures set forth below may be used by grievant who is a parent, or visitor.

3. Other Remedies

The existence of this procedure does not bar grievant from also filing in other forums to the extent permitted by state or federal law.

4. INFORMAL GRIEVANCE

Grievant is encouraged to discuss their concern or harassment complaint promptly and candidly with their immediate supervisor, the Principal I.

5. FORMAL GRIEVANCE

Within sixty (60) days of encountering the harassment, discrimination, or complaint that is the subject of the grievance, a grievant shall file a written notice with the Executive Director. The written notice shall identify the nature of the complaint, the date(s) of occurrence, and the desired result, and shall be signed and dated by the person filing the grievance. In the event the legal guardian or parent of a student is filing a grievance, the student and the legal guardian and/or parent shall sign and date the grievance. The Executive Director can be reached at the contact information provided below.

The Executive Director will immediately initiate an adequate, reliable, and impartial investigation of the grievance. Each formal complaint will be investigated, and depending on the facts involved in each situation, will be decided after receiving information from the appropriate individuals. Each investigation will include interviewing witnesses, obtaining documents, and allowing parties to present evidence.

All documentation related to the investigation and discussions held in this process are considered EXTREMELY CONFIDENTIAL and are not to be revealed to or discussed by any participant with persons not directly involved with the complaint, with its



## Whistleblower Protection Policy

Howard University Middle School (“MS<sup>2</sup>”). requires directors, officers, and employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of (MS)<sup>2</sup>, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Howard University Middle School is committed to lawful and ethical behavior in all of its activities and requires the board, advisors, employees and volunteers to act in accordance with all applicable laws, regulations and policies and observe high standards of business and personal ethics in the conduct of their duties and responsibilities. The objectives of (MS)<sup>2</sup>'s Whistleblower Protection Policy are to establish policies and procedures to:

- Prevent or detect and correct wrongdoing, including violation of public policies expressed in statutes, regulations, or constitutional provisions.
- Encourage each director, officer, employee and volunteer (“Individual”) to report what he or she in good faith believes to be a material violation of law or policy or questionable accounting or auditing matter by (MS)<sup>2</sup>;
- Ensure the receipt, documentation, retention of records, and resolution of reports received under this policy; and
- Protect Individuals from retaliatory action.

### Reporting Responsibility

Howard University Middle School Whistleblower Protection Policy is intended to provide protections for you if you raise concerns regarding (MS)<sup>2</sup>, such as concerns regarding incorrect financial reporting, unlawful activity, activities that are in violation of (MS)<sup>2</sup> policy, or activities which otherwise amount to serious improper conduct. This Policy is intended to encourage and enable employees and others to raise serious concerns internally so that (MS)<sup>2</sup> can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees, and volunteers to report concerns about violations of law or regulations that govern (MS)<sup>2</sup> operations.

**Each Individual at Howard University Middle School has an obligation to report what he or she believes is a material violation of law or policy or any questionable accounting or auditing matter by (MS)<sup>2</sup>, its directors, officers, advisors, employees, volunteers, or other representatives.** The types of concerns that should be reported include, for purposes of illustration and without being limited to, the following:

- Providing false or misleading information on (MS)<sup>2</sup> financial documents, grant reports, tax returns or other public documents.
- Providing false information to or withholding material information from (MS)<sup>2</sup> auditors, accountants, lawyers, directors or other representatives responsible for ensuring (MS)<sup>2</sup> compliance with fiscal and legal responsibilities.
- Embezzlement, private benefit, or misappropriation of funds.
- Material violation of (MS)<sup>2</sup> policy, including among others, confidentiality, conflict of interest, whistleblower, ethics and document retention.
- Discrimination based on any protected class.
- Sexual harassment or abuse.
- Retaliation against an employee who has engaged in protected activity;.
- Facilitating or concealing any of the above or similar actions.

### Reporting Procedure

Howard University Middle School has an open-door policy and suggests that employees share their questions, concerns, or suggestions or complaints with their supervisor. If you are not comfortable speaking with your



supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with Human Resources, the Executive Director. Supervisors and managers are required to report complaints or concerns about suspected ethical and legal violations in writing to MS<sup>2</sup>'s Compliance Officer or General Counsel who has the responsibility to investigate all reported complaints. Employees with concerns or complaints may also submit their concerns in writing directly to their supervisor or the organization's Compliance Officer.

- **Reporting Concerns**

- **Employees**

- Whenever possible, an employee should seek to resolve concerns by reporting issues directly to his/her supervisor or the next level of management as needed until matters are satisfactorily resolved.
    - As indicated above, if an employee is uncomfortable speaking to a supervisor or does not believe the issue is being properly addressed, the employee may contact Human Resources, the Executive Director or General Counsel.
    - If an employee does not believe that these channels of communication can or should be used to express his/her concerns, an employee may contact the chair of the Finance Committee.
    - Whenever practical, reports should be in writing

- **Board Members, Advisors, and Other Volunteers**

- Board members, advisors, and other volunteers may submit concerns to the Executive Director. If the volunteer, advisor, or board member is not comfortable reporting to Executive Director or if he/she does not believe the issue is being properly addressed, he/she may report directly to the chair of the Board.

**Wendell Johns,  
Board Chair  
405 Howard Pl. NW  
Washington DC 20059  
[Ms2board@hu-ms2.com](mailto:Ms2board@hu-ms2.com)**

**Donovan Anderson  
General Counsel  
Law Office of Donovan Anderson PC  
[danderson@donovananderson.com](mailto:danderson@donovananderson.com)**



investigation, or with the decision-making process. This provision does not include discussions with governmental authorities.

Within five (5) business days of receiving the written notice, the Executive Director shall respond in writing to the grievant (the "Response"). The Response shall summarize the course of the investigation; determine the validity of the grievance and the appropriate resolution.

If, because of the investigation, harassment, or a valid grievance is established, appropriate corrective and remedial action will be taken.

#### APPEALS

If the grievant is not satisfied with the Response, the grievant may appeal in writing to the Howard University Middle School of Mathematics and Science Board of Directors (or designee) within thirty (30) days of the date of the Response summarizing the outcome of the investigation. The written appeal must contain all written documentation from the initial grievance and the reasons for not accepting the Response. The appeal, in letter form, may be sent to Howard University Middle School of Mathematics and Science Board of Directors at 2400 Sixth Street, N.W. Room 302 Washington, DC 20059.

Within fifteen (15) days from receiving the written appeal, the Board Chair (or designee) will respond in writing to the appellant as to the action to be taken and the reasons, therefore.

#### PROHIBITION AGAINST RETALIATION

Howard University Middle School of Mathematics and Science pledges that it will not retaliate against any person who files a complaint in accordance with this policy, or any person who participates in proceedings related to this policy.

Additionally, Howard University Middle School of Mathematics and Science will not tolerate any form of retaliation against any person who makes a good faith report or complaint about perceived acts of harassment, discrimination, or concern, or who cooperates in an investigation of harassment, discrimination, or a concern. Any person who is found to be engaging in any kind of retaliation will be subject to appropriate disciplinary action.

#### MODIFICATION

Howard University Middle School of Mathematics and Science may approve modification of the foregoing procedures in a case if the modification (a) is for good cause, and (b) does not violate due process rights or policies of Howard University Middle School of Mathematics and Science.



CONTACT INFORMATION

Executive Director	HUMAN RESOURCES	CHAIRMAN OF THE BOARD OF DIRECTORS
<p>Kathryn Procope Executive Director 415 Howard Place, NW Washington, D.C. 20159 (202) 806-7725</p>	<p>Leslie Boler Director of Human Resources 405 Howard Place, NW Washington, D.C. 20059 (202) 806-7725</p>	<p>Wendell Johns H. U. Middle School of Mathematics and Science 405 Howard Pl NW Washington, D.C. 20059 (202) 806-2530</p>
<p style="text-align: center;"><u><b>Board of Directors</b></u>            Frank Ross - <a href="mailto:fross IO130@earthlink.net">fross IO130@earthlink.net</a>            Wendy P. Lewis - <a href="mailto:wpacc vk pmg.c0m">wpacc vk pmg.c0m</a>            Larry Smith - <a href="mailto:las smitty1a@hotmail.com">las smitty1a@hotmail.com</a>            Danielle Holley-Walker - <a href="mailto:DHWalker@law.howard.edu">DHWalker@law.howard.edu</a></p>		





In the discretion of the Middle School, 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 Middle School's satisfaction in an approved drug assistance or rehabilitation program.

To maintain a drug-free workplace, the Middle School 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 Middle School's safety experts on the hazards associated with drug abuse; and (9) video tape presentations on the hazards of drug abuse.)