



## **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, sex, sexual orientation, gender identity or expression, color, religion, disability, age, national origin, marital status or any other legally protected characteristic. 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 Director of Operations.

### **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 Director of Operations 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**

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. This policy applies to all terms and conditions of employment, including but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer,

leaves of absence, benefits, compensation, and training. We seek to comply with all applicable federal, state and local laws related to discrimination.

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 Grievance 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:

Jason Mellen, Director of Finance and Operations  
Girls Global Academy Public Charter School  
733 8th Street NW  
Washington, DC 20001  
202-600-4822

The grievance procedures outlined below establish how all 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 staff and third parties. These grievance procedures 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 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 Max Levasseur, 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 Max Levasseur [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.

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).

## **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.