



Carlos Rosario International Public Charter School Policies

Sexual harassment

Workplace Harassment

Consistent with its workplace policy of equal employment opportunity, Carlos Rosario School prohibits and will not condone any form of unlawful harassment based upon a person's protected characteristic, including race, ethnicity, color, religion, sex, age, age, national origin, disability, pregnancy, genetic information, political affiliation, gender identity or expression, sexual orientation, marital status, personal appearance, family responsibilities, matriculation or any other characteristic protected by applicable law.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made explicitly or implicitly a term or condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for employment decision(s) affecting the individual, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creates an intimidating, hostile, or offensive environment for the employee. Examples of conduct that may constitute sexual harassment may include:

Title IX Complaints (Sex Discrimination or Sexual Harassment)

For sex discrimination and sexual harassment complaints that are covered by Title IX only, the School follows the federal law Title IX of the Education Amendments of 1972. Anyone with inquiries about the School's Title IX policy or complaint procedure, or to make a complaint under Title IX, should contact the School's Lead Title IX Coordinator, whose contact information is:

Lead Title IX Coordinator

Robert Skelton

General Counsel

Carlos Rosario International Public Charter School

1100 Harvard St, NW

Washington, DC 20009

Ph: 202-797-4720 (office) or 202-379-6280 (cell)

rskelton@carlosrosario.org

Please see the attached Title IX Policy for more information including the complaint investigation process followed under Title IX.

Equal opportunity

Equal Employment Opportunity at Carlos Rosario School

Carlos Rosario School is committed to the principles of equal employment opportunity and complies with all applicable laws that prohibit discrimination and harassment in the workplace.

Carlos Rosario School is an equal opportunity employer and makes all employment-related decisions without discriminating with regard to race, ethnicity, color, religion, sex, age, national origin, disability, pregnancy, genetic information, political affiliation, gender identity or expression, sexual orientation, marital status, personal appearance, family responsibilities, matriculation or any other category protected by applicable law.

We believe that each individual employed by us has the right to be free from unlawful discrimination and harassment in the terms and conditions of employment. No form of discrimination or harassment toward any employee, student, or other person in our workplace or at our work sites will be tolerated. This policy applies to recruitment, selection, training, utilization, promotion, benefits, termination, disciplinary actions and all other personnel actions, terms, conditions and privileges of employment.

Drug-free workplace

Drug-free Workplace

Carlos Rosario School has a longstanding commitment to provide a safe and productive work environment free from alcohol and drug abuse. Employees should report to work fit for duty and free of any adverse effects of illegal drugs or alcohol. The School complies with the federal Drug-free Workplace Act of 1988.

Substance Abuse Awareness

Alcohol and drug use can pose a threat to the health and safety of employees and may negatively impact work performance. Moreover, local and federal laws prohibit the unlawful use, manufacture, possession, control, sale, dispensation, or distribution of any illegal narcotic or dangerous drug (“controlled substance”).

Prohibitions

Carlos Rosario School prohibits the unlawful use, possession, control, manufacture, sale, dispensation, or distribution of illegal drugs and/or alcohol on School premises. Note that the School does not permit marijuana for any purpose on campus. Employees who qualify under local law to use marijuana may not possess, store, use or share marijuana in the workplace or during School sponsored events. Carlos Rosario School also prohibits employees from working under the influence of illegal drugs or unlawful use of drugs and/or alcohol.

Employee Notification Requirements

As required by the federal Drug-free Workplace Act, as a condition of employment, all employees shall abide by this policy and notify the School’s Head of Human Resources of any criminal drug statute conviction for a violation occurring in the workplace no later than 5 days after the conviction. Failure to comply with these conditions will be grounds for disciplinary action up to and including termination.

Disciplinary Action

Employees may be subject to discipline up to and including termination in the event of:

- work performance impaired as a result of use or abuse of drugs or alcohol (either on or off campus);
- illegal use or abuse of drugs or alcohol on campus or on School business;
- conviction of violating a criminal drug statute in the workplace; or
- violation of any provision of this drug free workplace policy.

The School cooperates fully with law enforcement. Violations of this policy which are also

violations of federal or local law must be referred to the appropriate law enforcement agencies. In addition, the Drug-free Workplace Act requires the School to notify grant or contracting agencies of an employee's criminal drug statute conviction for a violation that occurred in the workplace. Employees should direct any questions or report any violations of this policy immediately to the Head of Human Resources.

Staff complaint resolution process

Complaint Procedure

Carlos Rosario School requires reporting of all incidents of discrimination or harassment, regardless of the identity of the offender. Complaints of harassment or discrimination in violation of this policy, must be reported immediately to the Head of HR or the CEO. Complaints under this policy against the CEO will be investigated with the oversight of the Chair of the Board.

The School will conduct a thorough and prompt investigation of any complaint, and maintain the investigation as confidential to the fullest extent feasible. The School will endeavor to complete the investigation within 30 days. Upon completion of the investigation, Carlos Rosario School will inform the complainant and take appropriate action up to and including termination, if necessary. The School has set up an online issue reporting system available for all employees. The EthicsPoint reporting system allows a simple way for employees to report an issue, including if they want to make an anonymous report. The site is hosted by a third party, so the School will not know the identity of anonymous reporters. It is available in English and Spanish anytime via the EthicsPoint website, mobile app, or phone. This reporting system is in addition to regular lines of communication - such as contacting your supervisor or HR directly - to discuss or report an issue.

Whistleblower policy

Whistleblower Policy

Carlos Rosario School is committed to promoting compliance with the laws, rules and regulations that govern its operations and encourages all of its employees to report unlawful conduct. Below are the procedures by which an employee may report complaints or concerns about any fraudulent, illegal or unethical conduct within the School.

What the Policy Covers

This Whistleblower Policy applies to serious concerns relating primarily to unethical, fraudulent, or illegal business conduct. This Policy is not intended to address every concern that may arise in the workplace. Employees should be aware that the School has other policies and procedures and available channels of communication for reporting certain concerns that may not be covered by this Whistleblower Policy and/or that may have more appropriate mechanisms for addressing such concerns, including the School's discrimination and harassment policies.

Responsibility of All Employees

It is the responsibility of all employees to uphold the conduct standards of the School and all are encouraged to report violations or suspected violations in accordance with this Whistleblower Policy.

No Retaliation

The School does not tolerate harassment, retaliation or reprisals of any kind against an employee who has submitted a good faith complaint under this Whistleblower Policy. An employee who retaliates against someone who has submitted a complaint in good faith is subject to discipline up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns relating primarily to unethical, fraudulent, or illegal business conduct within Carlos Rosario School.

Submitting a Complaint

Employees may submit complaints, concerns and information regarding unethical, fraudulent or illegal conduct to their immediate supervisors. However, if an employee is uncomfortable speaking with their supervisor or is not satisfied with the supervisor's response, or if the concern relates to a particularly serious or sensitive issues including accounting-related matters and allegations of corporate fraud, the employee is encouraged to raise the matter directly with a member of the Human Resources Department or the School's designated Compliance Officer. The current designated Compliance Officer for the School is the CEO. Supervisors and managers are required to report all complaints, concerns and information regarding potential unethical, fraudulent or illegal conduct to the School's Compliance Officer, who has specific and exclusive responsibility to investigate all reported violations. In the event that the complaint, concern or information relates to conduct of the CEO, the report should be made to the School's General Counsel.

Accounting and Auditing Matters

The finance committee of the Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Compliance Officer shall immediately notify the audit committee of any such complaint and work with the committee until the matter is resolved.

Acting in Good Faith

Anyone filing a whistleblower complaint must be acting in good faith. Any allegations that have been made in bad faith will be viewed as a serious disciplinary offense.

Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant or may be submitted anonymously. Employees who choose to identify themselves when submitting a report may be contacted in order to gain additional information. Reports of violations or suspected violations will be kept confidential to the extent possible.

Handling of Complaints

Any complaints made under this Whistleblower Policy will be promptly investigated and appropriate action will be taken.