

- Preferential treatment or promises of preferential treatment to an employee for submitting to sexual conduct, including soliciting or attempting to solicit any employee to engage in sexual activity for compensation or reward or disparate treatment for rejecting sexual conduct.
- Subjecting or threats of subjecting an employee to unwelcome sexual attention or conduct or intentionally making performance of the employee's job more difficult because of the employee's sex.
- Sexual or discriminatory displays or publications anywhere at the workplace by employees, such as:
 - Displaying pictures, cartoons, posters, calendars, graffiti, objections, promotional materials, reading materials, or other materials that are sexually suggestive, sexually demeaning or pornographic or bringing to work or possessing any such material to read, display or view at work;
 - Reading publicly or otherwise publicizing in the work environment materials that are in any way sexually revealing, sexually suggestive, sexually demeaning or pornographic; and
 - Displaying signs or other materials purporting to segregate an employee by sex in an area of the workplace (other than restrooms or similar rooms).

The illustrations of harassment and sexual harassment above are not to be construed as an all-inclusive list of prohibited acts under this policy. Moreover, please note that while in most situations a personal relationship is a private matter, these relationships are not appropriate in a professional setting, particularly where one of the parties has management or supervisory responsibilities. As such, consensual relationships in the workplace may violate SEED LA policy.

Complaint Procedure

Sexual or other harassment, discrimination, or retaliation of any kind serves no legitimate purpose and has a disruptive effect on the employee's ability to perform the employee's job properly. SEED LA takes allegations of harassment, discrimination and retaliation very seriously and will actively investigate all complaints. If it is determined that harassment has occurred, management will take appropriate action against the offending persons, up to and including termination of employment. If an employee believes that he or she has been harassed, discrimination, or retaliation or has witnessed the mistreatment of others, he or she needs to bring the concerns to the attention of management immediately in any of the following ways (also see form below in **Appendix A**):

- Report the conduct to the employee's immediate manager;
- Report the conduct to the employee's manager's manager;
- Report the conduct to the Human Resources Department; or
- Report the conduct to any member of management with whom the employee feels comfortable.

If the particular circumstances make a discussion with or a complaint to the employee's own manager inappropriate (for example the complaint involves the employee's manager), the employee should not hesitate to immediately bring the matter to the attention of the Human Resources Department or any member of senior management.

It is the School's policy that all such matters will be handled with appropriate care and discretion and receive a thorough investigation. When an employee brings a complaint to the attention of any member of management, the Human Resources Manager will be notified and an investigation of the allegations will be undertaken promptly. Such investigation shall generally include, at a minimum, interviews with all persons identified as having direct and personal knowledge of the incident(s) in question.

If the investigation reveals that inappropriate workplace conduct has occurred, management will take prompt and effective remedial action. Such measures are designed to put an immediate stop to the inappropriate conduct as well as prevent its recurrence. Therefore, management retains the right to take whatever action it believes appropriate under the circumstances, up to and including terminating the employment of the offending person.

Any person found to have unlawfully harassed, discriminated, or retaliated against another employee will be subject to appropriate disciplinary action, up to and including termination.

Internal Complaint Review

The purpose of the “Internal Complaint Review Policy” is to afford all employees of the School the opportunity to seek internal resolution of their work-related concerns. All employees have free access to the Head of School or Board of Directors to express their work-related concerns.

Specific complaints of unlawful harassment, discrimination, and retaliation are addressed under the School’s “Policy Prohibiting Unlawful Harassment, Discrimination, and Retaliation.”

Internal Complaints

(Complaints by Employees Against Employees)

This section of the policy is for use when a School employee raises a complaint or concern about a co-worker.

If reasonably possible, internal complaints should be resolved at the lowest possible level, including attempts to discuss/resolve concerns with the immediate supervisor. However, in the event an informal resolution may not be achieved or is not appropriate, the following steps will be followed by the Head of School or designee:

1. The complainant will bring the matter to the attention of the Head of School as soon as possible after attempts to resolve the complaint with the immediate supervisor have failed or if not appropriate; and
2. The complainant will reduce his or her complaint to writing, indicating all known and relevant facts. The Head of School or designee will then investigate the facts and provide a solution or explanation;
3. If the complaint is about the Head of School, the complainant may file his or her complaint in a signed writing to the President of the School’s Board of Directors, who will then confer with the Board and may conduct a fact-finding or authorize a third party investigator on behalf of the Board. The Board President or investigator will report his or her findings to the Board for review and action, if necessary.

This policy cannot guarantee that every problem will be resolved to the employee’s satisfaction. However, the School values each employee’s ability to express concerns and the need for resolution without fear of adverse consequence to employment.

Policy for Complaints Against Employees

(Complaints by Third Parties Against Employees)

This section of the policy is for use when a non-employee raises a complaint or concern about a School employee. If complaints cannot be resolved informally, complainants may file a written complaint with the office of the Head of School or Board President (if the complaint concerns the Head of School) as soon as possible after the events that give rise to the complainant’s concerns. The written complaint should set forth in detail the factual basis for the complaint.

In processing the complaint, Head of School (or designee) shall abide by the following process:

1. The Head of School or designee shall use his or her best efforts to talk with the parties identified in the complaint and to ascertain the facts relating to the complaint.
2. In the event that the Head of School (or designee) finds that a complaint against an employee is valid, the Head of School (or designee) may take appropriate disciplinary action against the employee. As appropriate, the Head of School (or designee) may also simply counsel/reprimand employees as to their conduct without initiating formal disciplinary measures.
3. The Head of School’s (or designee’s) decision relating to the complaint shall be final unless it is appealed to the Board of Directors. The decision of the Board shall be final.

General Requirements

1. **Confidentiality:** All complainants will be notified that information obtained from the complainants and thereafter gathered will be maintained in a manner as confidential as possible, but in some circumstances absolute confidentiality cannot be assured.
2. **Non-Retaliation:** All complainants will be advised that they will be protected against retaliation as a result of the filing of any complaints or participation in any complaint process.
3. **Resolution:** The Board (if a complaint is about the Head of School) or the Head of School or designee will investigate complaints appropriately under the circumstances and pursuant to the applicable procedures, and if necessary, take appropriate remedial measures to ensure effective resolution of any complaint.

Open Door Policy

SEED LA believes it is necessary to provide employees with channels of communication so they can have issues or questions promptly addressed. Therefore, employees should feel free to contact the Human Resources Department or any member of management with employment-related questions or concerns. If an employee has an unresolved concern, the employee has the right and responsibility to bring the concern to the attention of upper management. We believe that such concerns can be resolved within SEED LA.

Whistleblower Policy

SEED requires all employees to observe high standards of business and personal ethics in the conduct of their duties and responsibilities. As representatives of SEED LA, employees are expected to practice honesty and integrity in fulfilling our responsibilities. This policy is intended to encourage and enable employees to raise serious concerns internally so that SEED LA can address and correct inappropriate and unethical conduct and actions.

A whistleblower as defined by this policy is an employee of SEED LA who reports an activity that he/she considers to be illegal or dishonest. The whistleblower is not responsible for investigating any activities or for determining fault. Appropriate management officials are charged with this responsibility and are expected to take corrective measures. If an employee has knowledge of a concern or illegal and/or dishonest fraudulent activity, the employee should contact their supervisor or Human Resources immediately. If the employee is not comfortable with or not satisfied with the response provided, employees are encouraged to speak with the Head of School, Principal of Academics, or Principal/Director of Student Affairs. Employees may also confidentially report illegal or dishonest behavior confidentially by mailing a letter to the attention of the Human Resources Manager.

Anyone reporting a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the conflict of interest policy or of applicable laws and regulations. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense. An individual who makes allegations that are not substantiated, in good faith, is fully protected by this policy.

To the extent practicable, confidentiality will be maintained consistent with the needs to conduct an adequate investigation. This whistleblower policy is intended to encourage and enable employees to raise concerns within the organization for investigation and appropriate action. With this goal in mind, no employee who, in good faith, reports a concern shall be subject to retaliation. Moreover, an employee who retaliates against someone who has reported a concern in good faith is subject to discipline up to and including dismissal from the volunteer position or termination of employment. Any whistleblower who believes he/she is being retaliated against should contact Human Resources immediately.

Employees with any question regarding this policy should contact Human Resources.