



Employee Handbook

Code of Conduct Sections Only

Effective Date: July 2023



Welcome

Welcome to Veritas Prep! We wish you every success here! We believe that every employee contributes directly to our School's growth and success, and we hope you will take pride in being a member of our team.

This Employee Handbook was developed to describe some of our expectations for our employees. You should familiarize yourself with the contents of this Handbook as soon as possible, as you are required to comply with all the policies and practices it contains. It will answer many questions about employment with Veritas Prep, from now on referred to as the "School."

The contents of this document have been carefully considered. We believe you will find the policies to be beneficial to both you as an employee and to the School. We hope that your experience here will be challenging, enjoyable, and rewarding, and we look forward to collaborating with you!

Mission

At Veritas Prep, our mission is to prepare scholars in grades 5 through 12 to compete, achieve, and succeed in college and beyond.

Vision

We inspire all Veritas scholars to become changemakers who are equipped to choose their path, challenge inequity, and transform our world.

Values

Support Every Scholar: We know every child can achieve amazing things, and scholars are at the center of everything we do and every decision we make. We listen to and value their perspectives, highlight their strengths, support them through challenges, and help them build both academic and social-emotional skills.

Grow Together: We foster a culture of collaboration and teamwork, where we teach, learn, and grow together alongside our students. Through coaching, feedback, professional development, and authentic conversations, we become better educators, coworkers, and people.

Build Community: We regularly celebrate the successes of our students, teachers, staff, and families, creating a joyful school community where everyone feels valued and loved. We partner with and listen to families and the community to ensure that all voices contribute to the education of our scholars and that our practices meet the diverse needs of those we serve.

Be Anti-Racist: We push for equity, diversity, and inclusion daily. We strive to understand and challenge

the history of systemic oppression and racism that exists in education and in the world, to build our knowledge and challenge our biases and beliefs, and to continue on a path to becoming an anti-racist organization by embracing anti-racist principles.

Achieve Amazing Results: We ensure our students learn, grow, and succeed by delivering rigorous, relevant, and effective instruction, opportunities, and supports that lead to students' social-emotional and academic success.

Purpose of this Document

This document is intended to provide you with a general understanding of the policies and practices of the School. However, this document cannot anticipate every situation or answer every question about employment. Should you have any questions about this Handbook, we welcome you to address them with Human Resources. In addition, you can email hr@vpcs.org for any payroll, benefit, and other HR-related questions.

This Employee Handbook supersedes and replaces all previous policies and procedures including, but not limited to, all memoranda or written policies that may have been issued on the subjects covered in this document. The policies included are guidelines only and are subject to change as the School deems appropriate and necessary. To retain the necessary flexibility in the administration of policies, practices, and benefits, the School reserves the right to change, revise, interpret, or eliminate any of the policies, practices, or benefits described in this document at any time, with or without notice. From time to time, you may receive notice of new or modified policies, procedures, benefits, or programs. Any oral or written statements contrary to the policies, practices, or benefits described in this Employee Handbook, by anyone at the School, are unauthorized and disavowed and should not be relied upon. Any deviations from the stated policies must be authorized and approved in writing by Human Resources and the Chief Executive Officer.

Nothing in this Handbook or in any other document or policy is intended to violate any local, state, or federal law. Nothing in this Handbook is intended to limit any concerted activities by employees relating to their wages, hours, or working conditions, or any other conduct protected by Section 7 of the National Labor Relations Act. Furthermore, nothing in this Handbook prohibits an employee from reporting concerns to, filing a charge or complaint with, making lawful disclosures to, providing documents or other information to, or participating in an investigation or hearing conducted by, the Equal Employment Opportunity Commission ("EEOC"), National Labor Relations Board ("NLRB"), Securities and Exchange Commission ("SEC"), or any other federal, state, or local agency charged with the enforcement of any laws.

Employees must comply with this Handbook at all times. Failure to comply with any policies or procedures in this Handbook will result in discipline, up to and including termination of employment.

Open-Door Policy

We encourage open communication, feedback, and discussion about any matter of importance to an employee; therefore, employees are free to talk with any Supervisor at any time. Whether you have a problem, a suggestion, or an observation, we want to hear from you. By listening to you, the School can improve, address complaints, and foster employee understanding of the rationale for practices, processes, and decisions.

Most situations can and should be solved in discussion with your Supervisor; this is encouraged as your first effort, but you may also discuss your issues and concerns with School Leadership. While we provide employees with this opportunity to communicate their views, please understand that not every complaint can be resolved to the employee's satisfaction. Even so, we believe that open communication is essential to a successful work environment and all employees should feel free to raise issues of concern without fear of reprisal.

Please note that some School policies, such as the Sexual and Other Unlawful Harassment policy, contain specific reporting procedures that should be followed. Employees should utilize this Open-Door policy for any issues or ideas that are not addressed through the School's specific reporting procedures.

CONFIDENTIAL



Table of Contents

Welcome 2

Mission 2

Vision 2

Values..... 2

Purpose of this Document..... 3

Open-Door Policy 4

Table of Contents 5

Section 1: Employment Practices (Code of Conduct only, see full Handbook for full text) 8

 1.3 Equal Employment Opportunity/Nondiscrimination Policy 8

 1.5 Disability Accommodation 8

 1.6 Pregnancy and Lactation Accommodation 9

 1.13 Diversity, Equity, Inclusion and Anti-Racism 10

Section 2: Pay Practices (Code of Conduct only, see full Handbook for full text)..... 11

 2.5 Attendance and Punctuality 11

 2.7 School Schedules 12

Section 3: Time Off and Leaves of Absence (Code of Conduct only, see full Handbook for full text).....13

Section 4: The Workplace (Code of Conduct only, see full Handbook for full text).....13

 4.1 Appearance and Dress Code 13

 4.2 Code of Conduct 14

 4.3 No Solicitation or Distribution 14

 4.4 Prohibition Against Harassment 14

 4.5 Workplace Bullying 19

 4.6 Personal Relationships in the Workplace/Nepotism 20

 4.7 Workplace Violence Prevention 22

 4.8 Disciplinary Action 23

 4.9 Confidential School Information 24

 4.10 Conflicts of Interest 24

 4.11 Intellectual Property Rights 25

 4.12 Outside Employment 25

 4.13 Whistleblower Policy 25

 4.14 Media Contacts 27

Section 5: Health and Safety (Code of Conduct only, see full Handbook for full text)	28
5.1 School Safety.....	28
5.2 Communicable Diseases.....	28
5.3 Emergency Procedures and Crisis Management Plan.....	29
5.4 Reporting Injuries and Accidents.....	30
5.5 Security Inspections.....	30
5.6 Workplace Monitoring.....	31
5.7 Security and Visitors in the Workplace.....	31
5.8 Drug and Alcohol Use.....	31
5.9 Smoke-Free Workplace.....	33
5.10 Adverse Weather-Related Conditions.....	33
Section 6: Student Welfare (Code of Conduct only, see full Handbook for full text)	35
6.1 Student Records.....	35
6.2 Mandated Reporting of Suspected Abuse or Neglect.....	35
6.3 Maintaining Appropriate Boundaries with Students.....	37
6.4 Bullying Prevention.....	38
6.5 Physical Restraint.....	38
6.6 Student Complaints of Harassment.....	39
Section 7: Technology Policies (Code of Conduct only, see full Handbook for full text)	40
7.1 Electronic Communication.....	40
7.2 Social Media.....	42
Section 8: Operational Policies (Code of Conduct only, see full Handbook for full text)	45
8.3 Employee-Owned Vehicle Usage.....	45
Section 9: Leaving the School (Code of Conduct only, see full Handbook for full text)	47



CONFIDENTIAL

Section 1: Employment Practices (Code of Conduct only, see full Handbook for full text)

1.3 Equal Employment Opportunity/Nondiscrimination Policy

The School provides equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex (including pregnancy, lactation, childbirth or related medical conditions), gender identity, sexual orientation, national origin, ancestry, age, physical or mental disability, genetic information (including testing and characteristics), military service or veteran status, citizenship status, certain criminal records, HIV testing, a personal admission to a facility for the care and treatment of a mentally ill person, taking of parental leave, crime victim status, or any other classification protected by applicable local, state, and federal law.

This policy applies to all terms and conditions of employment, including, but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, compensation, training, scheduling, and leaves of absence. The School does not tolerate harassment, discrimination, or retaliation of any kind, including, but not limited to, these protected classes. We are counting on everyone, individually and collectively, to give this policy positive and constructive support.

The School also will not discriminate or retaliate against an employee because the employee provided evidence in connection with a claim for unemployment benefits or testified at any unemployment hearing. Any employee who believes they have been discriminated against should report their concerns to their Supervisor, Human Resources, the Title IX Coordinator, or any other member of leadership team with whom they feel comfortable.

1.5 Disability Accommodation

The School will not discriminate against qualified individuals with disabilities regarding any aspect of their employment. To comply with applicable laws ensuring equal employment opportunities for individuals with disabilities, the School will provide reasonable accommodations for the known physical or mental limitations of an otherwise qualified individual with a disability who is an applicant or an employee, unless undue hardship or a direct threat to the health and/or safety of the individual or others would result. Any employee who requires an accommodation in order to perform the essential functions of their job, enjoy an equal opportunity, and/or obtain equal job benefits should contact Human Resources by emailing hr@vpcs.org to request such an accommodation.

We will communicate with the employee and engage in an interactive process to determine the nature of the issue and what, if any, reasonable accommodation(s) may be appropriate. In some cases, this interactive process may be triggered without a request from the employee, such as when the School receives notice from its own observation or another source that a medical impairment may be impacting the employee's ability to perform their essential job functions.

Employees who believe they need an accommodation must specify, preferably in writing, what barriers or limitations prompted the request. The School will evaluate information obtained from the employee, and possibly their health care provider or another appropriate health care provider, regarding any reported or apparent barriers or limitations, and will then work with the employee to identify possible accommodations, if any, that will help to eliminate or otherwise address the barrier(s) or limitation(s). If an identified accommodation is reasonable and will not impose an undue hardship on the School and/or a direct threat to the health and/or safety of the individual or others, we will generally make the accommodation, or the School may propose another reasonable accommodation which may also be effective. Employees are required to cooperate with this process by communicating with the School regarding their requested accommodation, providing all necessary documentation supporting the need for accommodation and being willing to consider alternative accommodations when applicable.

1.6 Pregnancy and Lactation Accommodation

Employees and applicants with needs related to pregnancy, childbirth, or related conditions (including lactation), may request a reasonable accommodation to enable them to perform their job. A reasonable accommodation may include, but is not limited to, the following: more frequent or longer breaks; acquisition or modification of equipment or seating; assistance with manual labor; job restructuring; light duty; private non-bathroom space for expressing breast milk; modified work schedules; temporary transfers to a less strenuous or hazardous position; or time off to attend to a pregnancy complication or recover from childbirth. The School will provide a reasonable accommodation for needs related to pregnancy, childbirth, or a related medical condition so long as the requested accommodation does not impose an undue hardship on the School.

The School will not deny employment opportunities or take adverse employment action against otherwise qualified applicants or employees who request or use such reasonable accommodations. Employees who take leave as an accommodation under this policy will be reinstated to their original job or to an equivalent position with equivalent pay, seniority, benefits, and other terms and conditions of employment upon their notification to the School of their intent to return to work or when the employee's need for a reasonable accommodation ends.

The School may require that employees provide documentation about the need for a reasonable accommodation, or the need to extend an accommodation, from an appropriate health care or rehabilitation professional. The School will not require such documentation when the requested accommodation is more frequent restroom, food, and water breaks; seating; private non-bathroom space for expressing breast milk; or limits on lifting over 20 pounds.

Employees who have questions about this policy or who wish to request leave or other reasonable

accommodations under this policy should contact Human Resources by emailing hr@vpcs.org. When an employee makes a request for a reasonable accommodation, the School and employee will engage in a timely, good-faith, and interactive process to determine an effective reasonable accommodation.

1.13 Diversity, Equity, Inclusion and Anti-Racism

The School is working toward becoming an anti-racist organization and is committed to fostering, cultivating and preserving a culture of diversity, equity and inclusion. The collective sum of our individual differences, life experiences, knowledge, innovation, self-expression, unique capabilities and talent that we contribute through our work represents a significant part of not only our culture, but our reputation and achievement as an organization.

We embrace and encourage our employees' differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our School unique.

The School's diversity and anti-racism initiatives are applicable — but not limited to — our practices and policies on recruitment and selection, compensation and benefits, professional development and training, promotions, transfers, social engagement, and the ongoing development of a work environment built on the premise of equity, diversity, inclusion and anti-racism.

All employees of the School have a responsibility to treat others, including co-workers, scholars, families and vendors with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all School-sponsored and participative events. In addition, we expect all employees to participate in all professional development related to anti-racism, diversity, equity, inclusion, and cultural competence, and to support this work in their curriculum, classrooms, and practices. Employees should also become familiar with the [Veritas Network Anti-Racism Standards](#).

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination conflicting with the School's inclusion policy should contact the Civil Rights Coordinator or Title IX Coordinator.

Section 2: Pay Practices (Code of Conduct only, see full Handbook for full text)

2.5 Attendance and Punctuality

To maintain a productive work environment, the School expects all employees to report to work as scheduled, be on time, and be prepared to start work. Good attendance is a critical element in the performance of every employee and is essential for the continued success and growth of the School.

Absenteeism is disruptive to the School and places a burden on other employees; it may subject the absent employee to disciplinary action, up to and including termination of employment. If employees are unable to work their scheduled hours, they must follow the notification procedure as outlined in the Way of Life Handbook. Employees who need to leave early must notify their Supervisor as soon as they learn that they will not be able to complete their scheduled shift then follow the notification procedure as outlined in the Way of Life Handbook. The School may inquire about the general reason for an absence, tardiness, or early departure. Unless extenuating circumstances exist, employees must call in on each and every scheduled day on which they will not report to work, unless they are on an approved leave of absence. Any absenteeism not reported to management will be considered as unapproved time off.

Excessive absenteeism or tardiness may result in disciplinary action up to and including termination of employment unless the absence or tardiness is excused or approved. The following are examples of types of time off that will not be considered grounds for disciplinary action under this policy:

- Time off that was previously approved, including vacation;
- Paid sick and safe time provided under a mandatory sick and safe time leave law;
- Approved state and federal leaves of absence, including, but not limited to, jury duty leave, military leave, leave protected under the Family and Medical Leave Act or similar state laws, and time off or leave specifically approved by the School as an accommodation under the Americans with Disabilities Act or similar state laws; and/or
- Time off due to a work-related injury that is covered by workers' compensation.

Each situation of absenteeism, tardiness, or early departure will be evaluated on a case-by-case basis. Even one unexcused absence or tardiness may be considered excessive, depending upon the circumstances. However, the School will not subject employees to disciplinary action or retaliation for an absence, tardiness, or early departure for which discipline may not be imposed under applicable law. If the employee believes that their absence, tardiness, or early departure is (or should be) excused pursuant to applicable law, the employee must notify their Supervisor of this fact as soon as possible, but no later than at the time of the absence, tardiness, or early departure. (For the required timing of an employee's notice of the need for a foreseeable leave of absence, see the applicable leave policy.) If an employee believes they have been mistakenly subject to disciplinary action for an

absence, tardiness, or early departure that the employee believes is or should be excused/approved, the employee must immediately, as soon as they learn of the imposed discipline, discuss the matter with their Supervisor. The School will investigate the situation and any errors will be corrected.

2.7 School Schedules

Employees at the middle school are expected to arrive at 8:00 a.m. and remain at school until 3:30 p.m., unless a different schedule has been agreed upon and approved by the employee's supervisor. Employees at the high school are expected to arrive at 7:55 a.m. and remain at school until 3:30 p.m. Monday through Thursday, and 7:55 a.m. to 2:30 p.m. on Friday, unless a different schedule has been agreed upon and approved by the employee's supervisor.

All employees are expected to work on Black Out Days and requests for time off on Black Out Days may not be granted. If any employee is not present for a full day of work on a Black Out Day(s) without supporting documentation from a healthcare provider, their pay is subject to reduction for that day(s). A Black Out Day is a school day prior to or directly following a holiday weekend or school break and state testing days (MCAS).

All employees are expected to participate in professional development days which will typically include three weeks prior to the opening of school and up to 5 full days throughout the year.

When employees are away from the School for approved meetings or some other event, they are required to advise their supervisor of their whereabouts so that the School may contact them if it becomes necessary.

Regular attendance and punctuality is an essential requirement of employment at the School. Excessive or unexplained absences are grounds for termination of employment. The School expects all employees to arrive to work each day on a timely basis. More than three (3) unexplained late arrivals in one (1) month may result in postponing or negating of a salary increase and/or disciplinary action including termination. Three (3) consecutive days of absence without notification will constitute voluntary resignation from employment as of the last day worked.

There may be occasions when employees need to arrive late or leave early. In such situations, employees should notify their supervisor in writing at least one week in advance so that coverage can be arranged. Employees should inform their Supervisor of the reason for the late arrival or early departure (e.g., religious holiday, personal day, sick day, family emergency, etc.). The fact that an absence or tardiness may be approved does not insulate an employee from a review of the total number and timing of absences or lateness in any given period of time. Employees should reference the Way of Life Handbook for procedures on requesting time off.

Nonexempt and Hourly Employees

The School advises all hourly employees of their individual work schedules, including the times for lunch periods and all starting and stopping times for a given week. Schedules for all hourly employees will be set by the School according to staffing needs and operational demands. Hourly employees are not permitted to begin working prior to their scheduled starting time, or to work beyond their scheduled ending time without authorization from their Supervisor or an appropriate member of the leadership team. Hourly employees are not permitted to work through their rest or meal break periods to enable them to begin work later than scheduled or to leave work earlier than scheduled.

Section 3: Time Off and Leaves of Absence (Code of Conduct only, see full Handbook for full text)

Section 4: The Workplace (Code of Conduct only, see full Handbook for full text)

4.1 Appearance and Dress Code

Dress, grooming, and personal cleanliness standards contribute to the morale of all employees and affect the business image the School presents to our students and visitors. Dress is business casual. Employees should dress as good or better than students, modeling appropriate dress for college and career.

The following items are considered inappropriate: blue jeans, cargo pants, shorts, tank tops, sweat suits, flip-flops, slippers and overly revealing clothing. For example, skirts are acceptable if the length is to a person's fingertips when standing and hands by their side. In addition, ripped or soiled clothing is always inappropriate. Employees are permitted to wear blue jeans on Friday as long as they are wearing a college or Veritas shirt.

Exceptions to this policy will be made on certain occasions (e.g., field trips, injuries, etc.) and for employees in certain positions, such as the fitness instructor, building maintenance personnel, and operations team.

We encourage employees to seek the advice of their Supervisor if they have questions regarding appropriate dress or appearance at work. Employees who report to work improperly dressed or groomed may be instructed by their Supervisor to return home to change. The time that nonexempt employees are absent for this purpose will be unpaid unless state law requires otherwise.

Nothing in this policy is intended to prevent employees from wearing a natural hair or facial hair style

that is consistent with their cultural, ethnic or racial heritage or identity. This policy will be interpreted to comply with applicable local, state or federal law.

The School will reasonably accommodate exceptions to this policy if required due to an employee's religious beliefs, medical condition, or disability. Employees who need an accommodation should contact their Supervisor and/or Human Resources by emailing hr@vpcs.org.

4.2 Code of Conduct

The successful operation and reputation of the School are built upon the principles of fair dealing and the ethical conduct of our employees. Our reputation for integrity and excellence requires careful observance of the spirit and letter of all applicable local, state, and federal laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

The School expects all employees to act in accordance with all internal policies and aforementioned laws and regulations, and to refrain from any illegal, dishonest, or unethical conduct. The use of good judgment based on high ethical principles should guide employees with respect to acceptable conduct. If a situation arises where it is difficult to determine the proper course of action, employees should discuss the matter with their Supervisor. Compliance with this policy is the responsibility of every employee of the School. Disregarding or failing to comply with our standards of business ethics and/or code of conduct may lead to disciplinary action, up to and including termination of employment.

4.3 No Solicitation or Distribution

Employees must not solicit other employees or distribute literature or printed matter of any kind for any purpose during their working hours unless authorized by the School. Solicitation does not include mere discussions without a concurrent request for action. Working hours does not include breaks or other off-duty time. Employees are also not permitted to distribute literature or printed matter of any kind at any time in the work areas of the School. People who do not work for the School are prohibited from distributing literature of any kind or soliciting employees for any purpose at any time on School premises. Employees who are assigned to work at a customer's property are required to abide by all rules and regulations of the customer concerning solicitation, distribution, and the customer's bulletin boards.

4.4 Prohibition Against Harassment

It is the goal of the School to promote a workplace that is free of harassment. As a result, the School maintains a strict policy prohibiting sexual harassment and harassment against applicants and employees based on any legally-recognized status, including, but not limited to: race, color, religion, creed, sex, pregnancy (including lactation, childbirth or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member

status, citizenship status, certain criminal records, HIV testing, a personal admission to a facility for the care and treatment of a mentally ill person, taking of parental leave or any other status protected by federal, state or local law.

The School's anti-harassment policy applies to all persons involved in its operations, regardless of their position, and prohibits harassing conduct by any employee of School, including supervisors and non-supervisory employees. This policy also protects employees from prohibited harassment by third parties, such as customers, vendors, clients, visitors, or temporary or seasonal workers. If such harassment occurs in the workplace by someone not employed by the School, the procedures in this policy should be followed. The workplace includes actual work sites, any setting in which work-related business is being conducted (whether during or after normal business hours), School-sponsored events, or School-owned/controlled property.

Sexual Harassment Defined:

Sexual harassment includes unwanted sexual advances; requests for sexual favors; or visual, verbal, or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- 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.

Sexual harassment includes various forms of offensive behavior based on sex. The following is a non-exhaustive list of the types of conduct prohibited by this policy:

- Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates);
- Offers of employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails, or text messages;
- Verbal conduct: making or using sexually derogatory comments, innuendos, epithets, slurs, sexually explicit jokes, or comments about an individual's body or dress, whistling or making suggestive or insulting sounds;
- Verbal and/or written abuse of a sexual nature, graphic verbal and/or written sexually degrading commentary about an individual's body or dress, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets, or other social media postings;
- Physical conduct: touching, assault, or impeding or blocking normal movements and/or;
- Retaliation for making reports or threatening to report sexual harassment.

Other Types of Harassment:

Harassment on the basis of any legally protected status is prohibited, including harassment based on race, color, religion, sex, pregnancy (including lactation, childbirth, or related medical conditions), sexual orientation, gender identity, age (40 and over), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed service member status, or any other status protected by federal, state, or local law. Prohibited harassment may include behavior similar to the illustrations above pertaining to sexual harassment. It also includes, but is not limited to:

- Verbal conduct including taunting, jokes, threats, epithets, derogatory comments, or slurs based on an individual's protected status;
- Visual and/or written conduct including derogatory posters, photographs, calendars, cartoons, drawings, websites, emails, text messages, or gestures based on an individual's protected status; and
- Physical conduct including assault, unwanted touching, or blocking normal movement because of an individual's protected status.

CONFIDENTIAL

Complaint Procedure:

Any applicant or employee who believes that they have been subjected to prohibited harassment or retaliation by a coworker, Supervisor, student, visitor, vendor, or temporary worker of the School, or who believes another individual has been subject to such conduct, should report it immediately. Applicants and employees are encouraged to report concerns, even if they relate to incidents in the past, involve individuals who are no longer affiliated with School, or concern conduct occurring outside of work if it impacts the individual at work.

Complaints can be made verbally, or in writing, to the personnel listed below:

Marc Oldenburg Civil Rights Coordinator 370 Pine Street, Springfield, MA 01105 Phone: 413-264-3309 Email: moldenburg@vpcs.org	Jonathan Swan Title IX Coordinator 370 Pine Street, Springfield, MA 01105 Phone: 413-896-7061 Email: jswan@vpcs.org
--	---

Employees are not required to report any prohibited conduct to a Supervisor who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom the employee is uncomfortable discussing such matters.

Employees are encouraged, but not required, to communicate to the offending person that their conduct is offensive and unwelcome. Any Supervisor who receives a complaint of harassment or retaliation must immediately report the allegation to the Civil Rights Coordinator or Title IX Coordinator.

After a report is received, a thorough and objective investigation will be undertaken. Confidentiality will be maintained to the extent practical and permitted by law. Investigations will be conducted as confidentially as possible and related information will only be shared with others on a need-to-know basis. The investigation will be completed, and a determination made and communicated to the employee, as soon as practicable.

If a complaint of prohibited harassment or discrimination is substantiated, prompt and effective remedial action will be taken, including appropriate disciplinary action, up to and including termination of employment. If a complaint cannot be substantiated, the School may take appropriate action, such as additional training, to reinforce its commitment to providing a work environment free from harassment.

The Equal Employment Opportunity Commission (EEOC) and equivalent state agencies will accept and investigate charges of unlawful discrimination and harassment at no charge to the complaining party.

Supervisor's Responsibility:

All Supervisors are responsible for:

- Implementing this policy, which includes, but is not limited to, taking steps to prevent harassment and retaliation;
- Ensuring that all employees under their supervision have knowledge of and understand this policy;
- Promptly reporting any complaints to the Civil Rights Coordinator or Title IX Coordinator so they may be investigated and resolved in a timely manner;
- Taking and/or assisting in prompt and appropriate corrective action when necessary to ensure compliance with this policy; and
- Conducting themselves, at all times, in a manner consistent with this policy.

Failure to meet these responsibilities may lead to disciplinary action, up to and including termination.

Protection Against Retaliation:

Retaliation is prohibited against any person by another employee or by the School for using this complaint procedure; reporting proscribed harassment, discrimination, or retaliation; objecting to such conduct; or filing, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions, or otherwise denying any employment benefit.

Individuals who believe they have been subjected to retaliation or believe that another individual has been subjected to retaliation, should report this concern to the highest-ranking on-site supervisor or to the Civil Rights Coordinator or Title IX Coordinator. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this policy is substantiated, appropriate disciplinary action, up to and including termination of employment, will be taken. If a complaint cannot be substantiated, the School may take appropriate action to reinforce its commitment to providing a work environment free from retaliation.

Good Faith:

The initiation of a good-faith complaint of harassment or retaliation will not be grounds for disciplinary action, even if the allegations cannot be substantiated. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination.

Support for Individuals Impacted by Harassment or Retaliation:

The School will strive to assist anyone who has been subjected to unwelcome harassment or retaliation to feel more comfortable in the work environment. Such assistance may but does not necessarily include transfer or reassignment. Any such assistance is at the School's sole discretion.

Any employee who believes that they have been harassed or discriminated against should provide a written or verbal report to their Supervisor, another member of management, the Civil Rights Coordinator or the Title IX Coordinator as soon as possible. The responsibility to investigate complaints of harassment has been assigned to the Civil Rights Coordinator or Title IX Coordinator. Employees who believe they have been harassed or discriminated against may also file a formal complaint with either or both government agencies listed below:

The Massachusetts Commission Against Discrimination (MCAD) is the state agency responsible for handling complaints of harassment, including sexual harassment. The MCAD can be reached at the following locations:

- Boston Office: One Ashburton Place, 6th Floor, Room 601, Boston, MA 02108, (617) 994-6000
- Springfield Office: 436 Dwight Street, 2nd Floor, Suite 220, Springfield, MA 01103, (413) 739-2145
- Worcester Office: 484 Main Street, Room 320, Worcester, MA 01608, (508) 453-9630

The Equal Employment Opportunity Commission (EEOC) is the federal agency that investigates harassment claims, including claims of sexual harassment. The EEOC can be reached at:

- John F. Kennedy Federal Building, 475 Government Center, Boston, MA 02203, (800) 669-4000.

Complaints filed with the MCAD and the EEOC must be filed within 300 days of the incident giving rise to the claim.

Title IX Procedures and Policies:

The School and all employees are required to follow all policies and procedures required by the U.S. Department of Education Final Rule under Title IX of the Education Amendments of 1972, which prohibits discrimination on the basis of sex in education programs or activities receiving federal financial assistance. For more information about Title IX please [click here](#) or contact:

Jonathan Swan
Title IX Coordinator
370 Pine Street, Springfield, MA 01105
Phone: 413-896-7061
Email: jswan@vpcs.org.

4.5 Workplace Bullying

The School does not tolerate bullying behavior by its employees. Employees who engage in workplace bullying may be disciplined, up to and including termination of employment.

Workplace bullying is the repeated use of force, threats, or coercion to abuse, intimidate, or humiliate another employee. Workplace bullying includes, but certainly is not limited to, the following:

- Verbal abuse, such as the use of patently offensive, demeaning, and harmful derogatory remarks, insults, and epithets;
- Verbal or physical conduct that is threatening, intimidating, or obscene;
- Pushing, shoving, kicking, poking, tripping, assaulting, or threatening physical assault, or intentionally damaging a person's work area or property; or
- Sabotage, or deliberately subverting, obstructing, or disrupting another person's work performance.

Cyberbullying refers to bullying, as defined above, that occurs through the use of a computer, cell phone, smartphone, tablet, pager, or other device that transmits electronic information, regardless of whether the device is owned by or located at the School or connected to the School network. Cyberbullying is also prohibited. This policy in no way prohibits employees from engaging in activities that are protected under applicable state and federal laws, including, but not limited to, any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to speak with others, engage in workplace debates, and protest about their terms and conditions of employment.

Reporting and Response:

Employees who are subject to, or witness, workplace bullying are encouraged to notify the Civil Rights Coordinator or Title IX Coordinator immediately. The School will promptly investigate the complaint. The School will maintain confidentiality to the extent possible, consistent with its commitment to investigating the complaint promptly and thoroughly.

If the complaint is verified, the School will take appropriate remedial and/or disciplinary action, which may include, but is not limited to, verbal or written warnings, suspension, termination of employment, counseling, and other actions. The School will also report the complaint to law enforcement, if appropriate. The complaining party will be advised of the results of the investigation.

Anti-Retaliation:

The School strictly prohibits retaliation against an employee for making a good faith claim of bullying or for participating in good faith in an investigation of bullying. Reports of retaliation should be made to the Civil Rights Coordinator or Title IX Coordinator or any supervisor with whom the employee feels comfortable.

4.6 Personal Relationships in the Workplace/Nepotism

The School will not take any adverse employment action against any employee for engaging in romantic relationships during nonworking hours away from School premises. However, we will consider such relationships when they affect an employee's job performance, occur during working time or on School premises, or pose a danger of a conflict of interest.

A familial or intimate relationship among employees can create an actual, or at least potential or perceived, conflict of interest in the employment setting, especially where one relative, spouse, partner, or member of such a relationship manages another relative, spouse, partner, or member. To avoid this problem, we may refuse to hire or place a relative or other intimately associated individual in a position where the potential for favoritism or a conflict exists. For purposes of this policy, a relative is any person who is related by blood or marriage, or whose relationship with the employee is similar to that of persons who are related by blood or marriage (e.g., domestic partnership or civil union status). A dating relationship is defined as a relationship that may be reasonably expected to lead to the formation of a consensual "romantic" or sexual relationship.

If two employees marry, become related, or enter into an intimate relationship, they may not remain in a reporting relationship or in positions where one individual may affect the compensation or other terms or conditions of employment of the other individual. In other cases where a conflict or the danger of a conflict arises, even if there is no supervisory relationship involved, the parties may be separated by reassignment or terminated from employment, at the discretion of the School.

School employees are never permitted, under any circumstance, to engage in an intimate or romantic relationship with a student. School employees are required at all times to remain professional with students. If an employee becomes aware that a School employee is engaged in, or is attempting to engage in, an intimate relationship with a student, they must notify the Civil Rights Coordinator or Title IX Coordinator immediately.

The School does not prohibit the hiring of more than one person from the same family. It is committed to a policy of employment and advancement based on qualifications and merit and does not discriminate in favor of or in opposition to the employment of relatives. The School permits the employment of qualified relatives of employees, of the employee's household or immediate family as long as such employment does not, in the opinion of the School, create actual conflicts of interest. Family members under this policy are defined as one of the following: relationships by blood such as parent, child, grandparent, grandchild, brother, sister, uncle, aunt, nephew, niece, first cousin; and relationships by marriage such as husband, wife (as defined by state law), step-parent, step-child, brother-in-law, sister-in-law, father-in-law, mother-in-law, son-in-law, daughter-in-law, half-brother, half-sister, uncle, aunt, nephew, niece, spouse/partner of any of the above and cohabitating couples/significant others, common-law spouse, etc.

This policy seeks to avoid the perception of favoritism, conflicts in loyalty, discrimination, the appearance of impropriety, and conflicts of interest. It's also meant to ensure potential for perceived or actual conflicts do not arise.

Examples of conflicts of interest related to the employment of relatives include:

- Hiring decisions

- Promotions
- Renewal of contracts
- Performance evaluation
- Disciplinary procedures
- Salary considerations
- Respect for confidentiality

Decisions about hiring, promoting, evaluating, awarding salary increases, and terminating employees are based on qualifications for the position, ability, and performance. Every attempt is made to avoid favoritism, the appearance of favoritism, and conflicts of interest in employment decisions and the organization reserves the right to take action when relationships or associations of our employees impact our mission. The policy prohibits any employees who are family members from working in the same chain of command and prohibits the hiring of any related family members of the Board of Trustees. Employees are required to disclose changes in their personal situations, which may be covered under the School's nepotism policy.

In the event that this situation does occur, the Supervisor in the relationship will not be the decision-making authority in above areas for the employee. In addition, the Supervisor will not oversee or directly supervise the assigned designee. There must be a clear and uncompromised chain of command to ensure best practices remain intact. No family member is allowed to hold a direct supervisory position over another family member.

4.7 Workplace Violence Prevention

We are committed to providing a workplace free from violence and to maintaining a safe work environment. The School has adopted the following approaches to handle threats or acts of violence—including intimidation, bullying, physical or mental abuse, and/or coercion—that involve or affect School employees or that occur on the School's premises.

Employees must refrain from conduct that may be threatening or dangerous to others. Firearms, weapons, and all other dangerous or hazardous devices or substances are strictly prohibited from the School's premises without proper authorization.

All threats of (or actual) violence, both direct and indirect, should be reported as soon as possible to one's Supervisor or any member of the leadership team. This includes threats by coworkers, clients, vendors, solicitors, or other members of the public. When reporting a threat of violence, employees should be as specific and detailed as possible.

All suspicious individuals or activities on or around the School's premises or work-site locations should be reported as soon as possible to one's Supervisor, the Civil Rights Coordinator or Title IX Coordinator,

or any member of the leadership team. Employees should not place themselves in jeopardy or danger. An employee who sees or hears a commotion or disturbance near their work area should not try to intercede or see what is happening, but instead should immediately report the incident to any of the following: Supervisor, Chief Executive Officer, any member of the leadership team, or, if the situation calls for it, the police (911).

The School will immediately and thoroughly investigate all reports of threats of (or actual) violence and of suspicious individuals or activities. The identity of any individual who makes a report will be kept confidential to the fullest extent possible given the circumstances of each specific complaint. To maintain workplace safety and the integrity of its investigation, the School may suspend employees, with or without pay, pending an investigation.

Anyone determined to be responsible for threats of (or actual) violence or other conduct that is in violation of this Handbook will be subject to immediate disciplinary action, up to and including termination of employment. The School encourages employees to bring their disputes or differences with other employees to the attention of their Supervisor or an appropriate member of the leadership team before the situation escalates into potential violence. The School is eager to assist in the resolution of employee disputes and will not discipline employees for raising such concerns.

4.8 Disciplinary Action

The purpose of this policy is to state the School's position on the administering of equitable and consistent discipline for unsatisfactory conduct in the workplace. By complying with these standards, employees will be able to help maintain a positive and safe work environment for all employees and their colleagues.

To address the times when an employee has not lived up to the positive standards, we may provide an employee with counseling, utilize progressive discipline, or terminate employment. The School always maintains the sole discretion on deciding whether counseling, progressive discipline, or termination of employment is warranted.

The forms of disciplinary action that the School uses may include, but are not limited to, the following: verbal warning(s), written warning(s), suspension with or without pay, and termination of employment. The appropriate level of disciplinary action taken depends on the severity of the situation and the number of prior occurrences. In most situations where an employee has demonstrated unsatisfactory conduct, they may first receive a verbal warning, followed by a written warning, and finally termination of employment. There may be circumstances, however, where one or more steps are bypassed.

The School will determine the type of disciplinary action it chooses to administer based on the facts of each particular case, as deemed necessary, through a thorough investigation of the event by the

School. At no point are any of the aforementioned rules, policies, practices, or procedures intended to interfere with or inhibit (nor shall they have the effect of interfering with or inhibiting) an employee's ability to exercise any rights afforded or protected by local, state, or federal laws. Nothing in this section in any way alters the "at-will" employment policy. The School reserves the right, at its sole discretion, to take whatever disciplinary action it deems necessary notwithstanding this section.

4.9 Confidential School Information

Employees are expected to maintain the privacy of confidential information they obtain in the course of their employment, particularly regarding information and materials from and about students and families in accordance with 603 CMR 23.00 et. seq. and the Family Educational Rights Privacy Act (FERPA). The definition of "Confidential Information" does not include employee terms and conditions of employment which are not otherwise covered by or protected from disclosure by applicable privacy laws such as the ones named above. Moreover, this policy is not intended to restrict an employee's rights under the National Labor Relations Act (NLRA) to discuss their terms and conditions of employment. Employees found in violation of this policy are subject to disciplinary action, up to and including termination of employment.

4.10 Conflicts of Interest

Employees and their immediate families must avoid having any interests that are inconsistent with the best interests of the School, and must refrain from activities, investments, or associations that compete with the School; interfere with one's judgment concerning the School's best interests; exploit one's position with the School for personal gain; or might impair, or even appear to impair, their ability to make objective and fair decisions when performing their jobs. At times, employees may encounter situations where the business actions they take on behalf of the School may conflict with their own personal or family interests because the course of action that is best for them personally may not also be the best course of action for the School. For example, outside employment may pose a conflict of interest if the hours or work overlap or interfere with the employee's work for the School.

Anyone with a conflict of interest or potential conflict of interest must immediately disclose it to a member of the leadership team and recuse themselves from any negotiations, deliberations, or votes that involve the conflict of interest and take any other necessary actions as required by the School. If an employee is unsure if certain activities are considered a conflict of interest, they should discuss the matter with their Supervisor or an appropriate member of the leadership team. This policy in no way prohibits employee affiliations or activities that are protected under applicable state and federal laws, including, but not limited to, any activity that is protected under Section 7 of the National Labor Relations Act, which includes the right of employees to organize collectively and to speak with others about their terms and conditions of employment.

The Massachusetts Legislature and Governor passed legislation, Chapter 28 of the Acts of 2009, the ethics reform law, which imposes mandatory education and training requirements on public employers and public employees. The law authorizes the Massachusetts State Ethics Commission to establish procedures to implement and ensure compliance with these requirements, and these Implementation Procedures are issued pursuant to that authority. The mandatory training requirement of the Act requires that all town employees, including Board, Committee and Commission members, must complete the Massachusetts State Ethics Commission Online Conflict of Interest Training and Ethics Law Quiz upon hire and once every three (3) years.

All employees of the School must complete the online training program within 30 days after being hired. Upon completing the online training program, employees will receive a certificate of completion. Please print out the completion certificate and submit it to Human Resources (hr@vpcs.org). Employees should retain a certificate for their records. For instructions and/or assistance with this process, please contact Human Resources.

4.11 Intellectual Property Rights

The School is committed to providing an environment that supports the learning, teaching, and creative activity of its faculty, students, and staff and encourages the development of new and useful materials, devices, processes, and other Intellectual Property. These activities contribute to the public welfare, provide educational opportunities for students, contribute to the professional development of the individuals involved, and enhance the reputation of the School.

The School owns the rights to all works, inventions, developments and curriculum materials created by employees within the scope of their employment or whose creation involves the substantial use of School equipment, services, or resources. All curriculum materials, patentable inventions, computer-related software, databases, web-based learning, and related materials created or developed by employees of the School are property of the School and cannot be used or shared without permission.

4.12 Outside Employment

Employees may hold jobs in other organizations as long as they do not interfere with their job responsibilities at the School. If the School determines that outside work interferes with performance or conflicts with the interests of the School, it may require such employees to terminate their outside employment as a condition of remaining at the School. Outside employment will be deemed to pose a conflict of interest if it has or threatens to have an adverse impact on the School.

4.13 Whistleblower Policy

The School 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

the School, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

- A. Reporting Responsibility:** It is the responsibility of all directors, officers and employees to comply with the policies contained in its Employee Handbook and other relevant standards of professional ethical conduct and to report violations or suspected violations in accordance with this Whistleblower Policy.
- B. No Retaliation:** No director, officer or employee who in good faith reports a violation of ethical conduct shall suffer harassment, retaliation or adverse employment consequence. An employee who retaliates against someone who has reported a violation 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 within the School prior to seeking resolution externally.
- C. Reporting Violations:** The School's open-door policy suggests that employees share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an employee's Supervisor is in the best position to address an area of concern. However, if an employee is not comfortable speaking with their Supervisor or is not satisfied with their Supervisor's response, said employee is encouraged to speak with the Chief Executive Officer. Supervisors and managers are required to report suspected violations of professional ethical conduct to the School's Chief Executive Officer, who has specific and exclusive responsibility to investigate all reported violations. For suspected fraud, or when an employee is not comfortable following the School's open-door policy, individuals should contact the School's Chief Executive Officer directly. If the employee's concern is with the Chief Executive Officer, then the employee should contact the Chair of the Board of Trustees.
- D. Accounting and Auditing Matters:** The Board of Trustees shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing. The Chief Executive Officer shall immediately notify the Board of any such complaint and work with the Board until the matter is resolved.
- E. Acting in Good Faith:** Anyone filing a complaint concerning a violation or suspected violation of professional ethical standards must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of the policies. 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.
- F. Confidentiality:** Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

G. Handling of Reported Violations: The Chief Executive Officer or Chair of the Board of Trustees will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Office of the Inspector General – (800) 322-1323
Confidential Hotline – to report suspected fraud, waste or abuse in government

Office of the Inspector General – (617) 727-2200
to report various concerns of waste, fraud and abuse in government

Office of the State Auditor – (617) 727-6200 x156
to report state agencies on variances, shortages or thefts of funds or property

Division of Unemployment Assistance – (800) 354-9927 or email: uifraud@detma.org
to report under-reported or un-reported wages or persons collecting benefits while working.

4.14 Media Contacts

To ensure that the School communicates with the media in a consistent, timely, and professional manner about matters related to the School, employees should notify the Chief Executive Officer that they have been contacted by the media whenever they are asked to speak on behalf of the School so that the School knows that a media inquiry has been made. Do not respond to media inquiries on the School's behalf without authorization. This rule does not prevent employees from speaking with the media, but they should not attempt to speak on behalf of the School unless they have specifically been authorized to do so.

Section 5: Health and Safety (Code of Conduct only, see full Handbook for full text)

5.1 School Safety

The School is committed to the safety and health of all employees and recognizes the need to comply with regulations governing injury, accident prevention, and employee safety. Maintaining a safe work environment requires the continuous cooperation of all employees. The School will maintain safety and health practices consistent with the needs of our industry. If employees are ever in doubt about how to safely perform a job, it is their responsibility to ask their Supervisor for assistance. Employees must immediately report any suspected unsafe condition and/or any injury that occurs on the job. It is the responsibility of each employee to follow the established safety regulations and procedures. Employees who violate these safety rules may be subject to disciplinary action, up to and including termination of employment.

5.2 Communicable Diseases

The School is committed to providing a safe, healthy, and productive workplace. The purpose of this policy is to help protect everyone from the spread of and exposure to infectious (communicable) diseases. This policy covers those diseases that may be communicable in a work environment.

Examples include, but are not limited to:

- Chickenpox
- Measles
- Mumps
- Tuberculosis
- Meningitis
- Hepatitis B
- Whooping Cough
- Ebola Virus
- SARS
- MRSA
- Avian or other potentially pandemic influenza (but not the common seasonal flu)
- Coronaviruses

This policy is not intended to cover common illnesses such as colds and viruses, sore throats, and upper respiratory and common bacterial infections. Employees experiencing common illnesses should use good judgment (and heed their medical providers' advice) in deciding whether to report to work or not. Employees who decide to come in to work should take appropriate measures to limit the potential spread of their common illness to co-workers and customers (e.g., cover mouth/nose when coughing or sneezing, avoid shaking hands, wash hands frequently, etc.).

- A. Reporting to Work:** Employees who believe they may have contracted a communicable disease (as defined by this policy) should not report to the School until they have been evaluated and treated by their medical provider as necessary.

Employees who learn they have a communicable disease must not come to the School until they no longer have the communicable disease, or the disease is no longer transmissible through normal work contact, as determined by their medical provider.

Employees who come in to work but are not fit for duty due to illness (or any other reason), may be sent home by their Supervisor.

- B. Reasonable Accommodation:** If the School receives notice that an employee is requesting a reasonable accommodation for a communicable disease, it will make decisions regarding the request on a case-by-case basis based upon information submitted by the employee's medical provider, and will consider, among other relevant factors, the health and safety of other persons with whom the employee may interact.
- C. Confidentiality:** Except for circumstances in which the School is legally required to report workplace occurrences of communicable disease, the confidentiality of all medical conditions shall be maintained in accordance with applicable law. When it is required, the number of persons who will be informed of the employee's condition shall be kept at the minimum necessarily needed not only to comply with legally required reporting, but also to ensure proper care of the employee and to detect situations where the potential for transmission may increase. The School reserves the right to inform other employees that a co-worker (without disclosing the person's name) has been diagnosed with a communicable disease if the other employees might have been exposed to the disease, so that the employees may take measures to protect their own health condition.
- D. No Discrimination:** The School prohibits discrimination, harassment, and retaliation against applicants and employees who have or had a communicable disease.
- E. Responsibility:** In all cases of an absence due to the contraction (or potential contraction) of a communicable disease, the affected employee must notify their Supervisor and/or Human Resources immediately of their condition. Anyone who discovers evidence of a communicable disease that could endanger the health of others in the School must report it to a member of the leadership team and/or Human Resources. The School will notify the appropriate health department(s) as deemed necessary and/or if such reporting is required by law.

5.3 Emergency Procedures and Crisis Management Plan

The School has developed emergency procedures for responding to, among other things, events

requiring evacuation (e.g., fire alarm) or sheltering in place (e.g., police activity nearby or catastrophic weather event). These procedures exist to protect the safety of employees, students and other persons on School premises and to preserve order to ensure prompt rescue and/or medical treatment as needed. These procedures may be tested from time to time, as in the case of fire drills. Unless instructed otherwise, all employees should regard any activation of these procedures as an actual emergency.

Employees should review the School's Emergency Operations Plan and direct any questions to the Director of Operations.

5.4 Reporting Injuries and Accidents

Any injury, whether or not it requires medical attention, should be reported to the School. Reporting will ensure that any existing safety hazards are corrected. Federal law (Occupational Safety and Health Administration "OSHA") requires that the School keep records of all illnesses and accidents that occur in the workplace. Workers' compensation laws may also require that employees report any workplace illness or injury, no matter how slight. An employee who fails to report an injury may jeopardize their right to collect workers' compensation payments, as well as health benefits. OSHA also protects an employee's right to know about any health hazards that might be present on the job. An employee with any questions or concerns should contact their Supervisor for more information.

5.5 Security Inspections

The School wishes to maintain a work environment that is free of illegal drugs, alcohol, firearms, weapons, explosives, and other improper materials. To this end, the School prohibits the possession, transfer, sale, or use of such materials on its premises.

Desks and other storage devices are provided for the convenience of employees but remain the sole property of the School. Accordingly, they, as well as any articles found within them, can be inspected by any agent or representative of the School at any time, either with or without prior notice. In addition, to ensure the safety and security of employees and customers, and to protect our legitimate business interests, we reserve the right to question and inspect or search any employee or other individual entering or leaving School premises or job sites. The inspection or search may include packages or items that the individual may be carrying, including briefcases, backpacks, handbags, shopping bags, etc. These items are subject to inspection and search at any time, with or without prior notice. We also require employees to agree to reasonable inspection of their personal property and/or person while on the job or on the School's premises. The individual may be requested to display the contents of their personal property, in the presence of a School representative of the same gender. The School will not tolerate any employee's refusal to submit to a search.

5.6 Workplace Monitoring

Workplace monitoring may be conducted by the School to ensure quality control, employee safety, security, and client satisfaction. While on the School's premises, employees should have no expectation of privacy in their belongings or in the nonprivate workplace areas which include, but are not limited to, classrooms, designated parking areas, desks, computers, lockers, rest or eating areas, vehicles engaged in School operations, and any personal belongings on or in any of the above.

Employees who regularly communicate via the telephone may have their conversations monitored or recorded. Telephone monitoring is used to identify and correct performance problems through targeted training. Improved job performance enhances our clients' image of the School as well as their satisfaction with our service.

Computers and cell phones furnished to employees are the property of the School. As such, computer usage and files, including email usage and related files, may be monitored or accessed. The School may conduct video surveillance of non-private workplace areas. Video monitoring is used to identify safety concerns, maintain quality control, detect theft and misconduct, and discourage or prevent acts of harassment and workplace violence. Because the School is sensitive to the legitimate privacy rights of employees, every effort will be made to conduct workplace monitoring in an ethical, moral, and respectful manner.

5.7 Security and Visitors in the Workplace

Authorized visitors must be met at the front desk by the person they are visiting, or an escort should be arranged in advance. Employees are responsible for the conduct and safety of their visitors. Restricting unauthorized visitors helps maintain safety standards, protects against theft, ensures security of equipment, protects confidential information, safeguards employee welfare, and avoids potential distractions and disturbances.

If an unauthorized individual is observed on the School premises, employees should immediately notify the front desk and/or an Operations Team Member. If an employee believes there is a threat to their personal safety, or the safety of any other employee, the employee should immediately dial 911 and report the matter to the local law enforcement authorities as well as to an appropriate member of the leadership team.

5.8 Drug and Alcohol Use

The School is committed to providing a work environment free of the use of alcohol and the illegal use of drugs. Employees are expected to be in suitable condition to satisfactorily and safely perform their jobs. All employees are expected to conscientiously follow this policy and demonstrate a responsible attitude toward the use of alcohol and drugs.

Being under the influence of a drug or alcohol on the job poses serious safety and health risks to the user and to all those who work with the user. The use, sale, purchase, transfer, or possession of an illegal drug in the workplace, and the use, possession, or being under the influence of alcohol also poses unacceptable risks for safe, healthy, and efficient operations.

The School strictly prohibits the use, sale, attempted sale, conveyance, distribution, manufacture, purchase, attempted purchase, possession, cultivation, and/or transfer of illegal drugs or other unlawful intoxicants at any time, and in any amount or any manner, regardless of occasion. "Illegal drugs" means all drugs whose use or possession is regulated or prohibited by federal, state, or local law. These include prescription medication that is used in a manner inconsistent with the prescription or for which the individual does not have a valid prescription.

Marijuana remains illegal as a matter of federal law and therefore the use of marijuana and marijuana products is prohibited by this policy.

Counseling and Rehabilitation: An employee's decision to seek help voluntarily will not be used as a basis for disciplinary action, although the individual may be transferred, given work restrictions, or placed on leave, as appropriate. A request for help is considered voluntary only if it is made before the employee is asked to submit to any drug or alcohol test or is discovered to have otherwise violated this policy.

Recurring or continued problems with performance, unexcused attendance, or inappropriate workplace behavior may result in disciplinary action, including termination. This policy is not intended to restrict the immediate notification of police or other appropriate authorities when the situation demands their immediate intervention. In circumstances when a person's behavior requires that they be restrained or removed from School premises, the Supervisor should contact other local authorities.

Drug/Alcohol Testing: This policy outlines the practice and procedure designed to correct instances of employees being under the influence of alcohol and/or drug use in the workplace. This policy applies to all employees and all applicants for employment.

The School may require an employee to undergo a test to detect the presence of drugs or alcohol, at the School's expense, under the following circumstances:

- When the School has a reasonable suspicion that a person is under the influence of drugs or alcohol, due to the observation of the employee's behavior, odor of alcohol on the person, eyewitness report of drug or alcohol use by an individual, and/or any other indication of impaired behavior obvious to a reasonable person.
- When the employee is involved in an accident that results in bodily injury to themselves or others requiring outside medical care for anyone involved. Any employee whose acts, or failure to act,

or who appears to have caused or contributed to the accident will be subject to drug and alcohol testing even if they themselves were not injured in the accident.

- As a condition of continued employment for an employee who has been found to be in violation of this policy and has agreed in writing to submit to periodic testing as a condition of continued employment under the School's disciplinary system.

Submitting to a drug screening as noted above is a condition of employment. An employee who refuses to submit to drug and alcohol testing when required to do so as noted above will be considered to have voluntarily resigned from the School and will be separated from employment immediately.

5.9 Smoke-Free Workplace

Smoking and/or using tobacco products including e-cigarettes and vaporizers is never permitted on School grounds by anyone. Employees can report violations of this policy to their Supervisor.

5.10 Adverse Weather-Related Conditions

The School follows the Springfield Public School guidelines when adverse weather is forecasted. If an employee sees that Springfield Public is closed or delayed, then the School will be as well. Employees are encouraged to watch WWLP (channel 22) news to see the most current and up to date school delays and closings.

Regardless of whether the School is open, employees must determine whether, in their personal circumstance, they believe it is safe to travel to and from work. Employees should notify their Supervisor(s) if they decide to take paid time off due to inclement weather.

The expectation is that all employees will prepare for a closure when inclement weather is foreseeable. To remain productive, employees should bring any work home such as files, documents, or reports and/or ensure they understand how to access the School's remote server/VPN network and/or email platform. Employees must also coordinate with their Supervisor in advance to agree on a work-from-home strategy, as all requests must be approved.

If the School is announced to be closed, all exempt staff will receive their regular pay for the day of closure. Full-time nonexempt staff will receive an amount equivalent to their scheduled hours of base pay for the day. Please be advised that in the event of closure, the School still expects employees who have the ability, to work remotely. Employees will be required to use their available paid time off if they cannot report to work on a day in which the School is open and working from home is not possible.

Early Closures/Delayed Openings: When potentially dangerous weather develops during the day and a decision is made by the School to close early, both exempt and nonexempt employees will be compensated as if they had worked to the end of their regularly scheduled hours for that day. If an



employee elects to leave prior to the time the School closes, they will be required to use paid time off in an amount equal to the number of hours between the time they left and the time the School closed. If the School has a delayed start, full-time nonexempt employees will be compensated as if they had worked a full day.

CONFIDENTIAL

Section 6: Student Welfare (Code of Conduct only, see full Handbook for full text)

Section 504/ADA Coordinator

The School has designated the Director of Special Education and ELL as its Section 504/ADA Coordinator to coordinate the School's Section 504 and ADA compliance efforts.

6.1 Student Records

A "student record" is any information maintained by the School regarding an individually identifiable student. Employees should be aware that both federal and state laws address the confidentiality of student records and impose strict limitations on the School's ability to disclose them. Both the Family Educational Rights and Privacy Act (FERPA) and the Student Record Regulations adopted by the Massachusetts Board of Education at 603 CMR 23.00 apply to the School. Both FERPA and the state regulations are designed to ensure parents' and students' rights of confidentiality, inspection, modifying, and destruction of student records and to assist School authorities in carrying out their responsibilities.

Both FERPA and the state regulations place specific restrictions on when and under what circumstances the School may release student records to third parties outside of the School without the specific, written consent of the parents or guardian (or eligible student over the age of 14). Therefore, faculty and employees should never personally provide any records or information pertaining to a student to any person outside of the School without permission from the Chief Academic Officer.

Bear in mind, however, that the School may disclose information regarding a student to appropriate parties in connection with a health or safety emergency if that information is necessary to protect the health or safety of that student or other individuals. Direct all questions regarding the confidentiality of student, employee, or School information to the Chief Academic Officer.

6.2 Mandated Reporting of Suspected Abuse or Neglect

Educators play an important role in child protection. State law requires that teachers, nurses, guidance counselors, social workers, and school administrators "who, in their professional capacity, have reasonable cause to believe that a child under the age of eighteen years is suffering physical or emotional injury resulting from abuse inflicted upon them which causes harm or substantial risk of harm to the child's health or welfare, including sexual abuse, or from neglect, including malnutrition, shall immediately report such condition to the Department of Social Services." Mass. Gen. Laws, c. 119 51A.

Therefore, when any employee or faculty member in their professional capacity has reasonable cause to believe that a child under the age of eighteen (18) years is suffering from the effects of any form of

child abuse and neglect, the employee *must* report their concerns to the Chief Academic Officer, who will either assume responsibility for making the required report or assist in doing so. A failure to make such a report when required is punishable by termination and may also be a violation of the law.

The law provides that schoolteachers and administrators are mandated reporters and therefore *must* report child abuse and neglect to the Department of Children & Families (DCF). When someone reports to DCF that they think a child is being abused or neglected, the report is called a "51A report." The name "51A" comes from section 51A of Chapter 119 of the Massachusetts General Laws.

Mandated reporters must report to DCF if, when acting in their professional capacities, they have reasonable cause to believe that a child is suffering certain kinds of physical or emotional injury. The kinds of physical or emotional injuries that must be reported are the result of:

- Abuse inflicted upon the child that causes harm or substantial risk of harm to the child's health or welfare, including sexual abuse;
- Neglect, including malnutrition; or
- Physical dependence upon an addictive drug at birth.

When a mandated reporter comes to believe any of these things, they must immediately communicate with DCF orally and, within 48 hours, must file a written report with DCF detailing the suspected abuse or neglect. The School expects that any employee who has reason to suspect that a student has been abused or neglected will report whatever they know immediately to the Chief Academic Officer, who will then ensure that a report is made as required.

If an employee believes that a child is showing signs of abuse or neglect but is unsure, the employee or school leader should visit the [DCF website](#) which includes the "Key Resources" section, a detailed description of the signs of physical and emotional abuse and neglect.

Mandated reporting is also required for incidents of hazing. Hazing is defined as: "any conduct or method of initiation into any student organization, whether on public or private property, which willfully or recklessly endangers the physical or mental health of any student or other person. Such conduct includes whipping, beating, branding, forced calisthenics, exposure to the weather, forced consumption of any food, liquor, beverage, drug or other substance, or any other brutal treatment or forced physical activity which is likely to adversely affect the physical health or safety of any such student or other person, or which subjects such student or other person to extreme mental stress, including extended deprivation of sleep or rest or extended isolation."

An employee who witnesses or hears about an incident of hazing must immediately report the incident to the Chief Academic Officer or to an appropriate law enforcement official as soon as reasonably practicable.

6.3 Maintaining Appropriate Boundaries with Students

All School employees are responsible for acting as role models of appropriate behavior for students and setting and maintaining appropriate boundaries with students at all times. Because this is a school environment, boundaries may be crossed to relate to students and meet their needs meaningfully and effectively. However, there is some conduct that will always be deemed a violation of healthy boundaries and appropriate adult behavior. The School believes that its employees individually and collectively possess the wisdom and expertise necessary to conduct themselves in a manner that is educationally sound and acceptable both within the professional community and the community at large.

Physical contact: What constitutes appropriate physical contact in one circumstance may be totally inappropriate in another. Appropriateness will depend on a variety of factors, not the least of which will be the student's reaction and responses of other adults.

All physical contact between employees and students must have a valid educational purpose and objective, meeting the student's needs. The use of physical contact (including touching) except in an emergency situation, is strictly prohibited. Questions of the appropriateness of physical contact will be determined by the context of the contact on a case-by-case basis. Issues such as intent, context, location, circumstances, age, and sex are all considerations that may be relevant. Examples: Holding or comforting a student who has fallen and is crying may be appropriate, whereas placing a hand on a child's head to redirect their attention to the front of the room is not.

If a child or other employee specifically requests that they not be touched, then that request must be honored without question. If the child or other employee has not requested that they not be touched, then the following forms of touching are considered appropriate:

- Hugs given with permission to comfort an anxious or upset child
- Pats on the shoulder or back
- Handshakes
- Light "high fives" and hand slapping
- Touching shoulders
- Touching face to check temperature, wipe away a tear, and remove hair from face or other similar types of contact for similar comfort or care purposes
- Holding hands while walking with small children or children with significant disabilities for safety
- Reasonable self-defense
- Reasonable defense of another
- Reasonable restraint of a violent person to protect others or property
- Physical contact for safety purposes to prevent harm to a child (e.g., pulling a child to safety out of the path of a moving car)

Except as discussed above, the following forms of touching are never appropriate:

- Inappropriate or lengthy embraces
- Kisses
- Corporal punishment
- Sitting students on one's lap
- Touching buttocks, chests, or genital areas
- Pushing a person or another person's body part (other than to prevent injury, in self-defense, defense of another person, or defense of property)
- Showing affection in isolated areas
- Wrestling with students or other employees
- Bench-pressing another person
- Tickling
- Piggyback rides
- Massages
- Any form of unwanted affection
- Any form of sexual contact
- Poking fingers at another person that results in an offensive contact

6.4 Bullying Prevention

We expect that all members of our School community will treat each other with civility and respect. In accordance with both state law and School policy, the School seeks to provide and maintain a learning environment for our students that is free of bullying and any other verbal or physical misconduct that disrupts the learning environment or makes it unsafe.

The School's Bullying Prevention and Intervention Plan, which is provided to all students and their families, is published in response to Massachusetts law against bullying and is an integral part of our efforts to promote learning and prevent behavior that can impede the learning process. All employees are required to be familiar with and abide by the law and the School's anti-bullying plan, which can be found in the Student and Family Handbook. The Bullying Report form can be found [here](#).

6.5 Physical Restraint

The School will meet the state-mandated requirement for crisis prevention and restraint training for all employees in order to maintain a safe school environment conducive to learning. De-escalation training will be administered to all employees at the beginning of each academic year. New hires who are employed after the training will be trained within one (1) month of employment. All employees will receive an overview in administering crisis de-escalation techniques, state restraint regulations, and our program policy, as well as an overview of administering restraint, types of restraint, and restraint safety. **Only designated individuals, including the Crisis Team and selected teachers, will perform restraints as appropriate.**

6.6 Student Complaints of Harassment

If a student brings a complaint of harassment to any faculty member, that faculty member must pass the information on to the Civil Rights Coordinator or Title IX Coordinator. 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 the Civil Rights Coordinator or Title IX Coordinator or any member of administration, Human Resources will be notified and the School will promptly undertake an investigation of the allegations. Such investigation typically shall include, at a minimum, interviews with people identified as having direct and personal knowledge of the incident(s) in question. During the investigation, the School will protect the confidentiality of harassment allegations to the extent possible. The School cannot guarantee complete confidentiality, because it cannot conduct an effective investigation without revealing certain information to the alleged harasser and potential witnesses. However, the School will attempt to keep such disclosures to the minimum required under the circumstances, on a "need-to-know basis."

If the investigation reveals that the allegations are valid, the School will take prompt and appropriate remedial action against the offending person. Such measures are designed to put an immediate stop to the harassment as well as prevent its recurrence. Therefore, School management retains the right to take whatever action it believes appropriate under the circumstances, up to and including discharge of the offending person.

"Intent" to harm is not a measure of whether harassment has occurred at School. If a joke or comment (either written or verbal) is identified by a colleague or supervisor as inappropriate and, after intervention, the behavior continues, the School will consider the act as harassment.

Section 7: Technology Policies (Code of Conduct only, see full Handbook for full text)

7.1 Electronic Communication

This policy describes the School's rules for using its electronic resources, including email, voicemail, internet access, and computer systems.

A. Electronic Resources: Employees should use the School's electronic resources with the understanding that they are provided for the benefit of the business. Employees may use these resources for personal use, during non-working time, as long as such use complies with School rules and applicable laws. Employees should never use these resources for personal use in a manner that interferes with their work responsibilities.

Sending, saving, accessing, or viewing obscene or similarly offensive material on the School's electronic resources is prohibited. Messages stored and/or transmitted on these electronic resources, including the computer, voicemail, email, or the telephone system, must not contain content that may reasonably be considered to be obscene or other similarly offensive material. Prohibited material includes, but is not limited to, sexual comments; jokes or images; racial slurs; gender-specific comments; or any comments, jokes, or images that would discriminate against or harass someone based on race, color, sex, age, national origin or ancestry, disability, or any other category protected by federal, state, or local law. Likewise, any use of the internet, email, or any other electronic resource to engage in harassment or discrimination prohibited by School policies is unlawful and strictly prohibited.

Violators may be subject to discipline, up to and including termination of employment. Employees are also prohibited from downloading software and/or modifying any such files without permission from the copyright holder.

B. No Solicitation, Personal Gain, or Commerce: The School's electronic resources must not be used for solicitation purposes, personal gain, or commercial ventures of any kind.

C. Software Code of Ethics: Employees may not duplicate any licenses, software, or related documentation unless expressly authorized to do so by agreement with the licensor. Unauthorized duplication of software may subject users and/or the School to both civil and criminal penalties under the United States Copyright Act. Employees may not give software to any outsiders including contractors, customers, or others. Employees may use software on local area networks or on multiple machines only in accordance with applicable license agreements. The School reserves the right to audit any School computer.

- D. Employee Responsibility:** Each employee is responsible for the content of all text, audio, or images that they place or send using the School's electronic resources.
- E. Computer and Systems Security:** All computers and the data stored on them are, and always remain, the property of the School. As such, all messages created, sent, or retrieved over the internet or the School's electronic mail systems are the property of the School and should be considered School information. The School reserves the right to retrieve and read any message composed, sent, or received using the School's electronic resources.

Employees should be aware that even when a message is deleted or erased, it is still possible to recreate the message; therefore, ultimate privacy of a message cannot be ensured to anyone. Furthermore, all communications, including text and images, can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver. Employees should also be aware that duplicates of email transmitted through a personal, web-based email account using School equipment could be stored on that equipment; likewise, information regarding internet sites that an employee has accessed may also be stored.

Passwords and other log-in information for websites, the network, or other accounts belonging to the School must be provided to the Chief Academic Officer/Chief Executive Officer upon request. To protect confidential information, all School devices and computers must be logged off, locked, and/or shut down when not in use.

- F. Email Content Screening:** The School maintains the right to screen all inbound and outbound email content. Email messages or attachments that contain obscene or similarly offensive material may be quarantined and held from transmission or receipt until the sender or recipient can verify that the message or attached document is work-related. The School may, in its discretion, review communications to and from a personal account, subject to state laws regarding attorney-client communications.
- G. Virus Protection:** To prevent computer viruses from being transmitted through the system, employees are not authorized to download any software from the internet onto their computer or any drive in that computer. The School maintains virus protection software on all network servers and filters all inbound and outbound email for virus attachments.
- H. Questions Regarding the Use of the Internet or Email:** If employees have questions regarding the appropriate use of internet access or email systems, they should contact the Technology Coordinator.
- I. Cell Phones:** Cellular phones provided by the School to employees are primarily for business use; personal calls must be limited and not interfere in any way with an employee's work time or performance. Cellular phone invoices and messages may be regularly monitored to ensure

compliance with this policy. Personal use of School-provided cell phones, which results in additional charges including, but not limited to, toll fees or minute overages, will be charged to the employee.

- J. Personal Calls and Texting:** Personal calls, social networking, emails, and texting during working hours must be limited to breaks except in the case of an emergency. The use of cell phones or tablets during working hours also includes the use of such devices for texting, talking, playing games, or accessing the internet. Doing so during working hours will result in disciplinary action, up to and including termination of employment. Using School phones for personal international calls without authorization is strictly prohibited.
- K. Breach of this Policy:** Because it is not possible to define all unauthorized uses of the School's voice mail, email, and computer systems, disciplinary action may be taken in response to any conduct that warrants such action. In addition to the above provisions, other examples of prohibited conduct include:
- Unauthorized attempts to break into any computer physically or electronically;
 - Theft or copying of electronic files containing Confidential Information without permission; and
 - Sending or posting files containing Confidential Information to unauthorized personnel.

Failure to comply with any part of this policy will result in discipline, up to and including termination of employment.

7.2 Social Media

Social media includes all means of communicating or posting information or content of any sort on the internet, whether or not associated or affiliated with the School, as well as any other form of electronic communication. Employees are solely responsible for what they post online. Before creating online content, employees should consider some of the risks and rewards that are involved. They should keep in mind that any conduct that adversely affects School or violates any policy in this Handbook will result in disciplinary action, up to and including termination of employment.

- A. Know and Follow the Rules:** Inappropriate postings that include discriminatory remarks, harassment, threats of violence, or similar inappropriate or unlawful posts meant to intentionally harm someone will not be tolerated and may subject the employee to disciplinary action, up to and including termination of employment.
- B. Contact with Students:** Employees should refrain from accepting current students as "friends" or connections on social networking sites. Please remember that even after a student leaves the School, they will continue to see an employee as a representative of the School. Please ensure that any information that can be seen is appropriate for a professional relationship.

- i. Employees must have no electronic or telephone contact with students; this prohibition includes “friending” or otherwise communicating with students through Facebook, Twitter or other social networking sites and by means of “tweeting,” texting, e-mail or similar modes of communication. Any contact should be made through the parent/guardian.
- ii. Employees must not photograph or otherwise create images of any students without express written consent of the parent and/or guardian and the Chief Executive Officer or Executive Leadership.
- iii. No personally identifiable student information may be posted by employees on professional social media sites that are open beyond the classroom, which may include, for example, a “buddy” class in another country. If images of students are to be posted online there must be a media consent form on file at the School for each child featured.

C. Be Respectful: All employees should be fair and courteous. Employees should keep in mind that they are more likely to resolve work-related complaints by speaking directly with their coworkers or by using our Open-Door Policy than by posting complaints to a social media outlet. If an employee decides to post complaints or criticism, they should avoid using statements, photographs, videos, or audio that reasonably could be viewed as malicious, obscene, threatening, or intimidating; that disparage coworkers, students, or parents; or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment based on race, color, religion, sex (including pregnancy), gender identity, sexual orientation, national origin, ancestry, age, physical or mental disability, genetic information, military service or veteran status, or any other classification protected by applicable local, state, and federal laws.

D. Avoid Posting Information You Know to Be False: All employees should strive to be honest and accurate when posting information or news, and if they make a mistake, they should correct it quickly. Employees should be open about any previous posts that they have altered. They should remember that the internet archives almost everything; therefore, even deleted postings can be searched. They should never post any information or rumors that they know to be false about the School, coworkers, students, or parents.

E. Maintain Confidentiality of “Confidential Information”: Employees should maintain the confidentiality of the School's “Confidential Information,” as that term is defined in the separate Confidentiality Agreement.

F. Using Social Media at Work: Employees may not use the School's electronic resources to access social media while on working time unless it is work-related as authorized by their Supervisor. Employees may not use the School's email addresses for personal use.

G. Retaliation is Prohibited: The School prohibits taking negative action against any employee for reporting a possible breach of this policy or for cooperating in an investigation. Any employee



who retaliates against another for these reasons will be subject to disciplinary action, up to and including termination of employment.

CONFIDENTIAL

Section 8: Operational Policies (Code of Conduct only, see full Handbook for full text)

8.3 Employee-Owned Vehicle Usage

This policy establishes rules pertaining to the use of an employee-owned vehicle for work-related business. This policy applies to all employees using their personal vehicles for work-related business.

Definitions:

Employee-owned vehicle: A vehicle for which the employee is the owner or sole signatory of a vehicle-lease agreement.

Work-related business: Any activities carried out in connection with the interests of Veritas Preparatory Charter School including, but not limited to transporting students to and from school with parental permission, attending professional development seminars or workshops, dropping off or picking up student records, etc.

Personal Vehicle Use: Certain employees, because of their job requirements, will have to operate their personally owned vehicles while conducting school business. Use of a personal vehicle for work-related business is strictly prohibited without an Employee-Owned Vehicle Use Agreement (see Addendum 6). All employees who use a personal vehicle for work-related business must complete the Employee-Owned Vehicle Use Agreement (see Addendum 6).

Safe Driving Requirements:

- We consider no phase of operations or administration of being a greater importance than collision prevention.
- All occupants of a vehicle being used for work-related business must wear a seat belt.
- Maintain reasonable distance; allow for speed, road and weather conditions.
- The vehicles must be in sound mechanical condition and maintained according to manufacturer's specifications.
- Obey all traffic signs and signals with a full and complete stop.
- Drivers will follow all applicable State and Federal regulations.
- Driving for work while under the influence of drugs or alcohol will be cause for immediate termination.
- If a driver is on a prescribed medication that may affect their ability to safely operate a motor vehicle, they should not use their vehicle for work-related business until they have stopped taking the medication.
- The use of radar detectors is prohibited while driving for work.
- Tickets and moving motor vehicle violations that occur while driving for work are to be reported to Human Resources within 24 hours. The employee must be willing to participate in the incident

investigation.

- More than two moving violations or collisions during a 12-month period will prohibit an employee from using their personal vehicle for work-related business.

Cell Phone/Electronic Device Use: All employee-owned vehicle operators are responsible for using their vehicles in a safe and responsible manner while conducting work-related business and are to abide by all applicable traffic laws while operating the vehicles.

Usage of any handheld device (e.g., cell phones and GPF devices) is strictly prohibited while driving for work-related business. Cell phone usage with hands-free audio is also prohibited while operating a vehicle for work-related business.

Licensing Requirements: Employees operating an employee-owned vehicle for work-related business are required to possess a valid driver's license in good standing, and the license held must be valid for the type of motor vehicle being operated. Any operator who has their driver's license revoked or suspended shall notify Human Resources immediately. In this event, the operator shall immediately cease any usage of employee-owned vehicles for work-related business.

Veritas Preparatory Charter School reserves the right to check employees' Motor Vehicle Report from the Massachusetts Registry of Motor Vehicles at any time while they are using an employee-owned vehicle for work-related business. Employees approved to drive on work-related business are required to inform Human Resources of any changes that may affect either their legal or physical ability to drive, or their continued insurability.

Insurance Requirements: Prior to using their vehicle for work, employees will properly register, license, and insure their vehicle. Employees should carry for occasional use: \$100,000/\$300,000 bodily injury and \$50,000 property damage or \$300,000 combined single limit which is recommended and otherwise must carry state coverage limit minimums. Each employee must have, maintain, and renew the aforementioned insurance coverage while the vehicle is used to conduct work-related business.



Section 9: Leaving the School (Code of Conduct only, see full Handbook for full text)

CONFIDENTIAL