TITLE IX NOTICE, REPORTING AND GRIEVANCE POLICY

It is the policy of THE EPIPHANY SCHOOL OF GLOBAL STUDIES (the School) that students and staff should not be subjected to forms of unlawful discrimination, harassment, bullying, or hazing, while at school or school-sponsored activities. Furthermore, the policy’s intent is to address the issue in a proactive manner through the establishment of a system for educating students and staff at the School regarding the identification, prevention, intervention, and reporting of such anti-social acts. The School acknowledges the dignity and worth of all students and staff and strives to create a safe, orderly, caring and inviting school environment to facilitate student learning and achievement. The School prohibits discrimination on the basis of race, color, national origin, sex (including transgender), sexual orientation, disability, age or any other classifications prohibited by law. The School will not tolerate any form of unlawful discrimination, harassment or bullying in any of its educational or employment activities or programs. Please refer to the School’s other policies, including its Title IX Policy, Non-Discrimination and Harassment Policy, and student conduct policies.

The School’s Title IX Coordinator is:

Tara Hughes, 252-638-0122, extension 631, thughes@epiphanyglobalschool.org

**A. TRAINING AND PROGRAMS**

The designated Title IX Coordinator shall establish training and other programs that are designed to help eliminate unlawful discrimination, harassment and bullying and to foster an environment of understanding and respect for all members of the school community. Information about this policy and the related complaint procedure must be included in the training plan. The training or programs should:

(1) provide examples of behavior that constitutes unlawful discrimination, harassment or bullying;

(2) teach employees to identify groups that may be the target of unlawful discrimination, harassment or bullying; and

(3) train school employees to be alert to locations where such behavior may occur, including locations within school buildings, at school bus stops, on cell phones and on the Internet.

**B. NOTICE**

The designated Title IX Coordinator is responsible for providing effective notice to students, parents and employees of the procedures for reporting and investigating complaints of unlawful discrimination, harassment and bullying. This policy will be posted on the School’s website, and copies of the policy are available at the front office. Notice of this policy will appear in all student and employee handbooks and in any School publication that sets forth the comprehensive rules, procedures and standards of conduct for students and employees.

**C. COORDINATOR**

The Head of School or designee shall appoint one or more individuals to coordinate the School’s efforts to comply with and carry out its responsibilities under federal non-discrimination laws. These responsibilities include investigating any complaints communicated to the School alleging noncompliance with Title VI, VII or Title IX of the Civil Rights Act, Section 504 of the Rehabilitation Act, and/or the Americans with Disabilities Act (ADA), or alleging actions which would be prohibited by those laws. The Head of School or designee shall publish the name, and phone number of the compliance coordinator in a manner intended to ensure that students, employees, parents and other individuals who participate in the School’s programs are aware of the coordinator.

**D. RECORDS AND REPORTING**

The Title IX Coordinator shall maintain confidential records of complaints or reports of unlawful discrimination, harassment or bullying. The records will identify the names of all individuals accused of such offenses and the resolution of such complaints or reports. The Title IX Coordinator also shall maintain records of training conducted and corrective action(s) or other steps taken by the School to provide an environment free of unlawful discrimination, harassment and bullying. The Head of School shall report to the Board all verified cases of unlawful discrimination, harassment or bullying under the School’s Title IX Policy.

 **E. EVALUATION**

The Head of School or designee shall evaluate the effectiveness of efforts to correct or prevent unlawful discrimination, harassment and bullying and shall share these evaluations periodically with the Board.

**F. REPORTING TITLE IX VIOLATIONS**

1. For Students:

1. For bullying, there are multiple ways to report incidents of bullying. Students and families may report directly to any teacher, director, administrator or school counselor verbally, via email or in writing.
2. For discrimination, harassment, and sexual harassment/misconduct complaints, students or their parents should contact a trusted teacher or advisor, grade-level Director, Head of School and/or Title IX coordinator immediately and file a complaint.
3. When anyone reports harassment, bullying, and/or discrimination to a school employee, that employee shall notify the Title IX Coordinator, grade-level Director, or Head of School, as soon as possible and within 24 hours.
4. If the Head of School is involved in the allegation, then another administrator will immediately inform the Chair of the Board of Directors.

2. For Employees: for discrimination, harassment, and sexual harassment complaints, employees should contact the Title IX coordinator immediately and follow the School’s harassment and discrimination policy.

**G. RESOLUTION/GRIEVANCE PROCESS FOR EMPLOYEES**

Employee complaints under this policy will follow the process outlined in the School’s Harassment and Non-Discrimination Policy.

**H. INFORMAL RESOLUTION PROCESS FOR STUDENTS:**
Informal resolution may be an appropriate choice when the conduct involved is not of a serious or repetitive nature and disciplinary action is not required to remedy the situation. No formal investigation is involved in the informal resolution process, and the informal resolution process shall not be considered a precondition for the filing of a formal written complaint as set forth below.

1. A written request for informal resolution must be made within ten (10) days of the date of the alleged incident. The Head of School or designee shall determine whether the nature of the problem is such that it is likely to be resolved by agreement on an informal basis.
2. Methods for informal resolution may include, but are not limited to, coaching the person on how to directly address a situation which is causing a problem; mediating the dispute with the parties; developing written behavior expectations of the alleged offender to redirect conduct; assisting with the resolution of a real or perceived problem; or arranging a documented meeting with the alleged offender that involves a discussion of the sex discrimination and sexual harassment policies and requirements for compliance.
3. The Head of School or designee shall document any informal resolution, and a copy of such documentation shall be forwarded to the Title IX Coordinator within a timely manner.

**I. FORMAL COMPLAINT GRIEVANCE PROCESS FOR STUDENTS**

1. Prompt Filing. Where a Complainant wishes to file a formal complaint or where the School Director or designee believes that a complaint is not appropriate for the Informal Resolution Process, the following process shall apply. The Complainant must file a formal complaint within a reasonable time, ideally within 10 days of the alleged incident or within 5 days of the conclusion of the Informal Resolution Process. A complaint will not be disallowed solely because of the passage of time. The Title IX coordinator is charged with ensuring that all such complaints are timely, impartially, and appropriately investigated in accordance with applicable law.

2. Confidentiality. Every effort will be made to ensure the confidentiality of the complainant. There may be times where confidentiality may not be possible for the School to conduct a thorough investigation. There may also be instances where the School has a legal obligation to report certain information it receives to state or local authorities or to protect the School community.

3. Timeline. While the timeframe for completing an investigation into individual complaints may vary depending on the circumstances, the Title IX coordinator will ensure that timeframes are reasonable and endeavor to complete any investigation, including any decision and hearing, within sixty (60) days of the filing of a complaint.

4. Investigation. The Title IX coordinator shall designate an impartial investigator to conduct the investigation and may designate his/herself to conduct the investigation. The investigator shall have full authority to investigate, including the authority to interview witnesses and make a decision about the complaint. In reaching her/his decision, the investigator shall use the preponderance of the evidence standard. The investigator shall timely provide written notice of the outcome of the complaint to the relevant parties.

5. Appeal. In the event a party is not satisfied with the investigator’s decision, it may appeal that decision to the Head of School or if the Head of School is the subject of the investigation, then the party may appeal directly to the Board of Directors pursuant to the Mandatory Board Review set forth below. Such appeal shall be made in writing and provided to the Title IX coordinator within five (5) business days of the investigator’s decision.

6. Head of School Appeal. The Head of School review will be conducted in accordance with all applicable laws and s/he may, but is not required, to request information directly from the parties. The Head of School shall have a reasonable time, but not more than ten (10) business days from the date of the appeal, to review the appeal and issue a decision in writing.

7. Mandatory Board Review. If the appeal is to the Board of Directors, the board will appoint a panel of three board members to serve as the impartial review panel. The review will be conducted in accordance with all applicable laws and the panel may, but is not required, to request information directly from the parties. The three-member review panel will make a decision and will provide written notice of the outcome of the appeal to the parties within fourteen (14) school days, unless circumstances require more time.

8. Discretionary Board Review. If a party is not satisfied with the Head of School’s decision, it may file an appeal with the Board of Directors. The Board of Directors may grant discretionary review of the decision. If such discretionary review is granted, the Board will appoint a panel of three board members to serve as the impartial review panel. The review will be conducted in accordance with all applicable laws and the panel may, but is not required, to request information directly from the parties. The three-member review panel will make a decision and will provide written notice of the outcome of the appeal to the parties within fourteen (14) school days, unless circumstances require more time.

**J. POLICY APPLICATION**

This policy shall remain in effect as long as required by law.