



Non-Discrimination Policy and Process

We value the differences that are a part of our community due to, but not limited to, age, race, creed, disability, ethnicity, religion, sex/gender, gender identity, or sexual orientation. Each person at The Grayson School has a right to feel safe and valued. Any behavior that is intimidating and demeaning for the people involved is a violation of these beliefs and values and undermines the spirit of the community. We do not and will not tolerate unlawful harassment of our teachers, staff, or students.

Non-Discrimination Statement:

The Grayson School prohibits discrimination against and harassment of students and/or school employees on the basis of race, color, national origin, ancestry, religion, sex, sexual orientation, gender identity, gender expression, disability, age, and/or any other protected characteristics under all applicable laws or school policies in the administration of its educational policies, admissions policies, financial aid policies, athletics, and other school-administered programs and activities. The Grayson School is proud to be an Equal Opportunity Employer. We celebrate diversity and are fully committed to creating a just, equitable, and inclusive community at our school.

Students and employees are entitled to an employment and educational environment that is free of discriminatory harassment. This policy is intended to provide notice of compliance with federal and state civil rights laws to all employees, students, parents/guardians, applicants for admission and employment, and other interested persons, as appropriate. The Grayson School will require all persons, agencies, vendors, contractors, and other persons and organizations doing business with or performing services for the school to adhere to this policy and to all applicable federal and state laws pertaining to school operations.

The Grayson School does not tolerate discriminatory harassment of any employee, student, visitor, or guest. Protected class harassment constitutes a form of discrimination that is prohibited by The Grayson School policy. Harassment in this context is defined as unwelcome conduct by any member or group of the school community on the basis of actual or perceived membership in a class protected by policy or law.

The term “harassment” includes, but is not limited to, slurs, jokes, and other verbal, graphic, visual or physical conduct relating to an individual’s race, color, national origin, ancestry, religion, sex, sexual orientation, gender identity, gender expression, disability, age, and/or any other protected characteristics. “Harassment” also includes sexual advances, incidents of sexual assault or violence, requests for sexual favors, offensive touching, and other verbal, graphic, or physical conduct of a sexual nature.

The Grayson School will act to remedy all forms of harassment when reported, whether or not the harassment rises to the level of creating a hostile environment. A hostile environment is one that unreasonably interferes with, limits, or denies an individual’s educational or employment access, benefits, or opportunities. This discriminatory effect results from harassing verbal, written, graphic, or physical conduct that is severe, persistent and/or pervasive, and objectively offensive. This policy also prohibits retaliation, which is defined as any materially adverse action taken because of a person’s participation in a protected activity. Protected activity includes reporting an incident that may be a violation under this policy, participating in the grievance process, supporting a person who is engaging in a process as described under this policy, or assisting in providing information relevant to an investigation under this policy.

When harassment rises to the level of creating a hostile environment, The Grayson School may also impose disciplinary action. Harassment/sexual harassment of students by school employees is considered grounds for disciplinary action, up to and including discharge. Harassment/sexual harassment of students by other students is considered grounds for disciplinary action, up to and including expulsion. The Head of School or designee will determine appropriate sanctions for harassment and creation of a hostile environment (discriminatory harassment) of students by persons other than school employees and students.

Designation of Title IX Coordinator:

Jenny Nance, Chief Operating Officer, is the designated individual who responds to actual notice of an allegation and serves as the Title IX Coordinator (and Responsible Employee, referred to as Title IX Coordinator) under this policy to oversee its implementation. The Title IX Coordinator is the individual who has the primary responsibility for coordinating The Grayson School’s efforts related to investigation, resolution, and implementation of corrective measures and monitoring to stop, remediate, and prevent discrimination, harassment, and retaliation prohibited under this policy.

The Title IX Coordinator shall make specific and continuing steps to notify students, parents/ guardians, employees, applicants for admission and employment, all unions or professional organizations holding collective bargaining agreements, and the public of where and how to initiate the grievance process described in this policy. The Title IX Coordinator will ensure adequate non-discrimination procedures are in place, recommend new procedures or modifications to procedures, and monitor the implementation of this policy.

Title IX Coordinator Contact Information:

Allegations of violations of this policy, or questions about this policy, may be made internally to:

Jenny Nance, Chief Operating Officer
Title IX Coordinator
211 Matsonford Road
Radnor, PA 19087
jnance@thegraysonschool.org
484-428-3241

Inquiries may also be made externally to:
Office of Diversity, Inclusion & Civil Rights (ODICR)
U.S. Small Business Administration
409 3rd Street, S.W. Suite 6400
Washington, DC 20416
Phone: 202-205-6750
TTY/TTD: 1/800-877-8339
Web: <https://www.sba.gov/offices/headquarters/odicr>

Mandatory Reporter Policy:

Under this policy, all employees of The Grayson School are designated as mandatory reporters. All employees are expected to report knowledge of or reports of incidents of discrimination or harassment of students or employees that are made to them, or which they become aware, to the Title IX Coordinator and may also make a report to law enforcement, when the latter is required or desired by the party involved. The Title IX Coordinator will act accordingly when an incident is reported to them. If the matter involves possible abuse of a minor, then a report must immediately be made as

required under state and/or local law, including to child welfare services and/or local law enforcement.

As stated in Grayson's Faculty Handbook, "Pennsylvania law requires educators to report any suspicion of child abuse or neglect to the relevant authorities. For this reason, you **MUST** report any suspected child abuse, sexual abuse, sexual exploitation or neglect involving potential physical or mental injury **immediately externally** via ChildLine and then to a member of the administration so that the school can promptly comply with its legal reporting requirements. These laws are in place to prevent children from being abused and to end any possible abuse or neglect at the earliest possible stage. See addendum for additional information."

Grievance Procedure:

A. Any individual who has experienced discrimination or harassment, or believes that a student or employee has been discriminated against or harassed should report their concern promptly in writing to the Title IX Coordinator. Individuals who are unsure whether discrimination or harassment has occurred, or who need assistance in preparing a written complaint, are encouraged to discuss the situation with the Responsible Employee.

B. Employees are expected to promptly report possible incidents of discrimination or harassment of students or employees to the Title IX Coordinator. Parents/guardians and other adults are also encouraged to report any concerns about possible discrimination or harassment of students.

C. Students, employees, and others will not be retaliated against for making a complaint or participating in an investigation.

D. Retaliation is illegal under state and federal nondiscrimination laws and any retaliation by students or school staff will result in disciplinary measures, up to and including expulsion or dismissal.

Complaint Handling and Investigation:

A. The Title IX Coordinator shall promptly inform the Head of School and the person(s) who is the subject of the complaint (hereinafter, "respondent") that a complaint has been received.

B. The Title IX Coordinator may pursue a prompt and equitable informal resolution of the complaint with the agreement of the parties involved. Any party to the complaint may decide to end an informal resolution process and pursue the formal process at any point. The informal resolution is subject to the approval of the Responsible Employee, who shall consider whether the informal resolution is in the best interest of the parties and the school unit in light of the particular circumstances and applicable policies and Laws.

C. The Grayson School will conduct an adequate, reliable, and impartial investigation. Typically, a complaint will be investigated by the Responsible Employee, unless the Responsible Employee designates another person to investigate it on his/her behalf. Any complaint about an employee who holds a supervisory position shall be investigated by a person who is not subject to that supervisor's authority. Any complaint about the Responsible Employee or Head of School should be submitted to the chair of The Grayson School Board, who may consult with legal counsel concerning the handling and investigation of the complaint.

1. The respondent will be provided with an opportunity to be heard as part of the investigation. The complainant shall not be required to attend meetings with the respondent but may choose to do so as part of the resolution process.
2. The complainant and the respondent may suggest witnesses and/or submit materials they believe are relevant to the complaint.
3. When the complaint involves allegations relating to conduct that took place away from school property, school-sponsored activities, or school transportation, the investigation may include inquiries related to these allegations to determine whether they resulted in continuing effects such as harassment or a discriminatory impact in school settings.
4. Privacy rights of all parties to the complaint shall be maintained in accordance with applicable state and federal laws.
5. The Title IX Coordinator shall keep a written record of the investigation process.
6. The Title IX Coordinator may take interim remedial measures to reduce the risk of further discrimination or harassment while the investigation is pending. Examples of interim measures include, but are not limited to, ordering no contact between individuals, changing schedules or classes, etc.
7. The Title IX Coordinator may consult with the Head of School or designee concerning the investigation, conclusions, and any remedial and/or disciplinary actions.
8. The investigation shall be completed promptly. Typically, investigations are completed within 21 business days of receiving a complaint, if practicable. The

Responsible Employee may extend this time frame at his/her discretion for good cause.

D. If the Title IX Coordinator determines that discrimination or harassment occurred, he/she shall, in consultation with the Head of School or designee:

1. Determine what remedial action, if any, is needed to end the discrimination or harassment, remedy its effects, and prevent recurrence;
2. Determine what disciplinary action should be taken against respondent, if any; and
3. Inform both the respondent and the complainant in writing of the results of the investigation and its resolution (in accordance with applicable state and federal privacy laws).

E. If the complainant and/or respondent is dissatisfied with the resolution, an appeal may be made in writing to the Head of School within 10 business days after receiving notice of the resolution. The Head of School shall review the investigation report and may conduct further investigation if deemed appropriate. The Head of School's decision shall be provided in writing to the parties within 10 business days, if practicable. The appeal decision shall be final.

These policies may intersect with the following student policies: bullying and cyberbullying, hate speech and bias incidents, sexual behavior and sexual harassment.

Adoption date: July 20, 2020