



FirstLine Schools does not discriminate on the basis of sex in its education programs and activities and, accordingly, requires its staff, teachers, employees and students to abide by the requirements of Title IX of the Educational Amendments of 1972 and its regulations. Sexual harassment is a form of sex discrimination and is explicitly prohibited, whether such conduct occurs on or off campus during or after school hours during or directly related to school-sponsored activities, or at a time and/or place directly related to school functions or an employee's school-related duties. It is the intent of FirstLine Schools to maintain an environment free from sexual assault and sexual harassment of any kind; therefore, this policy commands that no student shall be subjected to sexual assault or sexual harassment by other students or FirstLine Schools staff or employees. This policy shall be enforced and the accompanying procedures shall be implemented regardless of whether a complaint has been filed with or an investigation has been instituted by any law enforcement agency.

Questions regarding Title IX may be referred to the U. S. Department of Education, Office of Civil Rights (OCR) or to FirstLine Schools' Title IX Coordinator, Rebekah Cain at phone number: 504-952-1331; or email: rcain@firstlineschools.org.

- 1) Sexual assault or sexual harassment is unwelcome conduct of a sexual nature.
- 2) Sexual harassment may include, but is not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal, nonverbal, or physical conduct of a sexual nature when at least one (1) of the following occurs:
 - a) Submission to such conduct is made, either implicitly or explicitly, a term or condition of the student's grades, academic status, or progress or is used to deprive the student of access to the educational opportunities and benefits provided by the FirstLine Schools.
 - b) Submission to or rejection of such conduct is used as the basis for academic or other school-related decisions affecting the student.
 - c) Such conduct of a sexual nature is sufficiently severe, persistent, or pervasive and has the purpose or effect of unreasonably interfering with the student's academic performance or of creating an intimidating, hostile, or offensive educational environment for the student.
- 3) Extended Definition of Sexual Harassment which may include but is not limited to:
 - Verbal harassment or abuse;

- b) Any employee who is determined to have permitted, engaged in, or failed to report sexual assault, sexual harassment or retaliation in violation of this policy and the related procedures may be subject to disciplinary action, up to and including termination.

Each School Director, Principal, staff member, and teacher has the responsibility of taking such reasonable steps necessary and practicable to maintain a work environment and educational environment free of sexual assault and sexual discrimination or harassment. Such steps shall include implementation of the following:

- 1) All teachers, other staff members, and all employees shall cooperate, as needed, in any formal and informal investigations instituted under this policy. The School Director is responsible to investigate any report of sexual discrimination or harassment involving student on student in coordination with the Title IX Coordinator. Reports involving an employee shall also be immediately reported to the Title IX Coordinator.
- 2) All School Directors, administrators and staff in charge of discipline of students shall, in accordance with policy and law, take such disciplinary action against any student found to be in violation of the sexual harassment policy as may be appropriate under the circumstances.
- 3) Within the first week of school each school year, the Title IX Coordinator through each School Director or School Operations Manager shall ensure that an in-service program addressing the sexual harassment policy and procedures is provided for all teachers, staff and employees.
- 4) During orientation at the beginning of each school year or at the time of a new student's enrollment, the School Director of the school shall ensure that instruction about sexual harassment, FirstLine Schools policy, and its procedures are provided to students.
- 5) Teachers, counselors, and administrators shall instruct students on the sexual assault, dating violence, or sexual harassment report and complaint procedures within the educational setting on an as-needed basis.
- 6) Each School Director or School Operations Manager shall ensure that the sexual assault, dating violence, or sexual harassment policy and procedures are provided to all students, parents, and employees by:
 - a) Including a restatement of the policy and procedures in the student handbook;
 - b) Posting an age-appropriate restatement of the policy against sexual assault and sexual harassment, the report and complaint procedures, and notice of the Title IX Coordinator at visible and accessible sites for students, for parents, and for employees;
 - c) Making a copy of the complete policy and procedures available on request for students, parents, and employees at the school office and the central office; and
 - d) Maintaining the policy and procedures on FirstLine Schools website.

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Rebekah Cain, Executive Director of Operations, 504-952-1331 and rcain@firstlineschools.org.

Any appeal or grievance related to a Title IX Investigation shall be sent in writing to FirstLine Schools Chief Executive Officer, Sabrina Pence, at the following address: 300 N Broad St, Ste. 207, New Orleans, LA 70119 and emailed to: spence@firstlineschools.org.

In reviewing the decision, the Chief Executive Officer of FirstLine Schools may uphold, modify, or reverse the decision of the Title IX Coordinator; however, the Chief Executive Officer of FirstLine Schools' review of the Title IX Investigation findings is final.