



Consistent with Title IX of the Education Amendments of 1972 (“Title IX”), The Waverly School (the “School”) does not discriminate on the basis of sex in its educational programs and activities, recruitment, admissions, course offerings, financial aid, athletics, or employment.

In addition to this Title IX policy, the School has established separate policies, that, among other things: (1) outline the School’s mandated reporting guidelines; (2) outline the School’s processes for managing interpersonal relationships safely and appropriately; and (3) seek to prevent sex-based discrimination and sexual harassment. Please see the School’s Student & Family Handbook or Employee Handbook, as applicable, for further information about these policies.

Students, parents/guardians, and employees are also encouraged to communicate with the Head of School or the Assistant Heads of School with any questions or concerns regarding these policies. The School believes that open communication about these sensitive topics is integral to preventing serious misconduct from occurring and is essential to fostering a culture of personal responsibility, mutual accountability, and positive leadership.

Compliance Coordinator

The Compliance Coordinator is responsible for administering and ensuring the School’s compliance with Title IX. In order to ensure compliance with Title IX in all facets of the School’s operation, the Compliance Coordinator will coordinate with the School’s Administration to implement and administer this policy and the School’s related grievance procedures for resolving Title IX complaints. The Compliance Coordinator is also responsible for investigating complaints of sex-based discrimination, sexual harassment, or other allegations regarding violations of Title IX; working with law enforcement regarding such complaints when necessary; and ensuring that complaints are resolved promptly and appropriately to the extent possible. The Compliance Coordinator may delegate these duties to other school employees or external investigators, as necessary and in his or her sole discretion, to ensure the prompt and appropriate resolution of any complaint.

The Compliance Coordinator (or his or her designee) may also meet with the School’s students, parents/guardians, and/or employees regarding their rights and obligations under Title IX and to address any questions regarding the School’s compliance with such obligations.

Inquiries concerning this policy, Title IX, and any related issues of sex-based discrimination should be directed to the School’s Compliance Coordinator:

Name: Heidi Johnson
Title: Head of School
Office Address: 67 W. Bellevue Drive
Telephone Number: 626-792-5940
E-mail Address: heidi@thewaverlyschool.org

Sexual Harassment

The School prohibits sexual harassment by students, employees, or third parties when the conduct is sufficiently serious to deny or limit a student’s ability to participate in or benefit from the School’s educational programs and activities; submission to or rejection of such conduct is made, either explicitly or implicitly, a term or condition of



admission or employment or the basis for an admission or employment decision; or such conduct has the purpose or effect of unreasonably interfering with performance or creating an intimidating, hostile, humiliating, or sexually offensive learning or work environment.

Title IX prohibits several types of sexual harassment. For the purposes of this policy, sexual harassment is defined as conduct on the basis of sex that satisfies one of the following: (i) a school employee conditioning education or employment benefits on participation in unwelcome sexual conduct (*i.e.*, *quid pro quo* harassment); (ii) unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the school's education program or activity; or (iii) sexual assault, dating violence, domestic violence, or stalking. All of these types of sexual harassment are forms of sex-based discrimination prohibited by Title IX.

Harassing conduct may take many forms, including verbal acts and name-calling, as well as nonverbal behavior, such as graphic and written statements, or conduct that is physically threatening, harmful, or humiliating. The more severe the conduct, the less need there is to show a repetitive series of incidents to prove that sexual harassment occurred, particularly if the conduct is physical. Indeed, a single or isolated incident of sexual violence may constitute sexual harassment.

Sexual harassment may occur between students, between students and employees, between employees, between students and third parties, and between employees and third parties, regardless of the genders of the victim and harasser.

Complaints and Investigation Process

The responsibility to investigate complaints (and/or designate other individuals to conduct investigations) under this policy has been assigned to the Compliance Coordinator. Students who experience or witness conduct in violation of this policy should immediately report it to the Compliance Coordinator or any member of the School's Administration. Employees who experience, witness, or otherwise become aware of conduct or allegations of conduct in violation of this policy are required to immediately report it to the Compliance Coordinator.

Complaints may be reported in person, by mail, by telephone, or by e-mail, by submitting the School's Title IX Complaint Form to the Compliance Coordinator, or any other means that results in the Compliance Coordinator receiving the person's verbal or written report. The Title IX Complaint Form may be obtained from the Head of School.

Upon receipt of a complaint, the Compliance Coordinator (or his or her designee) will promptly conduct an investigation in such a way as to maintain confidentiality to the extent practical under the circumstances. The Compliance Coordinator (or his or her designee) will conduct the investigation in compliance with the School's Title IX Grievance Procedures.

Any student or employee who is found to have harassed another student or employee will be subject to disciplinary action (up to and including expulsion and/or termination of employment). The School will also take appropriate corrective action to address harassment by third parties.



Prohibition Against Retaliation

Unlawful retaliation or reprisal by any student or employee against parties, witnesses, or any other participants in the Title IX reporting and investigation process is strictly prohibited. Individuals who believe they have been retaliated against in connection with reporting a complaint or otherwise participating in the Title IX process should immediately report such conduct to the Compliance Coordinator.

Any student or employee who is found to have retaliated against a student or employee in violation of this policy will be subject to disciplinary action (up to and including expulsion and/or termination of employment).