DRAFT POLICY A — CIVIL RIGHTS AND GENERAL GRIEVANCE PROCEDURE

Proposed effective date: [date] | Replaces: General Grievance Policy revised October 24, 2024

1. Purpose and commitment

Walden School of Liberal Arts ("Walden" or "the School") is committed to an educational and work environment in which students, families, employees, applicants, and others participating in School programs are treated with dignity and have meaningful access to educational programs, activities, and employment opportunities. Walden prohibits discrimination, harassment, and retaliation as required by applicable federal and Utah law and School policy. Walden will respond to concerns promptly, fairly, impartially, and in a manner appropriate to the circumstances.

2. Scope and relationship to other procedures

This policy provides a general route for concerns, complaints, and allegations of discrimination or harassment. Where a separate law or policy requires a specific procedure, that procedure controls to the extent of any conflict. Examples include Title IX formal complaints of sexual harassment; Title VI complaints; Section 504 and ADA complaints; IDEA procedural safeguards and due-process matters; employment complaints; and bullying, cyberbullying, hazing, abusive-conduct, or retaliation procedures. A report received under this policy must be promptly routed to the appropriate officer; a reporting person will not be turned away solely because the concern was submitted to the wrong person or through the wrong route.

This policy does not limit a person's right to contact a state or federal agency, law enforcement, or another external body, or to make a report required by law. It does not replace emergency response or mandatory reporting obligations.

3. Nondiscrimination

Walden prohibits discrimination and harassment on any basis protected by applicable law. Depending on the person and context, these protections may include race, color, national origin, sex, disability, religion, age, and other characteristics protected by federal or Utah law. This statement is not intended to suggest that every statute applies to every category or every setting. Walden will provide reasonable accommodations and accessible communication as required by law.

4. Designated officers and contact information

The Executive Director shall maintain a current list of designated compliance officers for Title VI, Title IX, Section 504/ADA, special education/IDEA, and employment-related complaints. Names, titles, office addresses, email addresses, and telephone numbers shall be verified at least annually and published on Walden's website and in applicable handbooks/notices. The Title IX Coordinator must be identified as such. A person may report to any School employee; employees must route reports promptly to the appropriate officer and follow any applicable reporting duty.

If a complaint concerns the officer who would ordinarily receive or investigate it, the complaint may be submitted to the Executive Director. If it concerns the Executive Director, it may be submitted to the Board Chair or an independent designee identified by the Board. If it concerns a trustee or Board Chair, the complaint shall be routed to an uninvolved Board officer or independent reviewer. No person may investigate or decide a complaint in which they have a conflict of interest or bias.

5. How to raise a concern

A concern may be raised verbally or in writing, in person, by telephone, email, mail, or another accessible means. A person may report on their own behalf or on behalf of another person. Walden may ask for clarifying information, but a specific form, legal terminology, or written statement is not required to receive or assess a report. The School will assist with language access and disability-related communication needs as appropriate.

Walden encourages prompt reporting so that it can respond effectively. However, there is no general 60-day deadline for Walden to receive or review a civil-rights concern under this policy. A delay in reporting will not, by itself, bar review or response. A delay may affect what evidence is available or which process remains available under applicable law. Separate statutory or administrative filing deadlines for external complaints may apply.

6. Initial review and interim support

Upon receiving a report, the appropriate officer will promptly assess immediate safety concerns, possible mandatory reports, the need for supportive or interim measures, the applicable policy and legal framework, and whether referral to another officer or agency is required. Supportive measures may include counseling referrals, schedule or class adjustments, academic flexibility, contact restrictions, safety planning, or other appropriate measures. Measures should preserve access to education or employment and should not be punitive unless imposed through an authorized process.

7. Informal resolution

When appropriate, Walden may offer voluntary problem-solving, facilitated conversation, mediation, or restorative practices. Participation must be informed and voluntary; a person may decline without penalty. Walden will not require a complainant to confront the person complained about or to use informal resolution before making a report. Informal resolution is not appropriate where prohibited by law or a governing procedure, including Title IX restrictions on certain employee-to-student sexual-harassment allegations. The School may proceed with a formal response when necessary to address safety, legal obligations, or the known circumstances.

8. General review and investigation

For matters governed by this general procedure, the designated officer will acknowledge the concern as soon as practicable, normally within five (5) business days, unless circumstances require a different schedule. The officer will meet with the reporting person when appropriate, normally within ten (10) business days, and will explain the process and anticipated next steps. The School will conduct a prompt, impartial, and proportionate review. Depending on the concern, this may include interviewing involved persons and witnesses, reviewing documents or other evidence, providing a meaningful opportunity to respond to material allegations, and consulting appropriate specialists.

The School will make reasonable efforts to complete the review and provide a written response within thirty (30) business days after receipt of the report. If more time is reasonably needed, the officer will notify the parties of the reason and revised target date, subject to legal requirements and any separate controlling procedure. The School may continue to address safety or access concerns while the review is pending.

9. Outcome and corrective action

The written response will describe the issue reviewed, the general steps taken, the conclusion or resolution to the extent appropriate, and any next steps available under this policy. Walden will take appropriate corrective action when a violation is found, which may include supportive services, changes in practice, training,

monitoring, restorative measures where appropriate, or discipline consistent with applicable law and policy. Information about another student's or employee's confidential records or specific sanctions will not be disclosed except as permitted or required by law.

10. Appeal

A reporting person may appeal a general-procedure outcome in writing within ten (10) calendar days after receiving the written response. The appeal should identify the concern with the process or outcome and any relevant information not previously considered. An uninvolved Executive Director or designee will review the appeal; if the Executive Director was involved in the original response or is the subject of the complaint, the Board Chair or an independent reviewer designated by the Board will appoint an uninvolved appeal reviewer. If the Board is the appeal body, any trustee with a conflict must recuse themselves. The appeal reviewer may affirm the response, request further review, or modify the resolution. A written appeal decision will normally be issued within fifteen (15) business days, with notice if additional time is needed. This appeal process does not replace any separate appeal right required by law or another policy.

11. Privacy and records

Walden will protect the privacy of people involved to the extent reasonably possible and permitted by law. Absolute confidentiality or anonymity cannot be guaranteed; information may need to be shared with people who have a legitimate need to know, to conduct a fair review, to provide support, or to meet legal obligations. Records will be maintained under the School's approved records-retention schedule and applicable law, including any longer retention period required for Title IX, special education, employment, litigation hold, or other records.

12. Retaliation and knowingly false reports

Retaliation is prohibited against a person for making a good-faith report, requesting support, participating in a review, serving as a witness, or exercising a right protected by law. Walden will respond to reported retaliation and may take appropriate corrective action. A report that cannot be substantiated is not, by itself, evidence that the report was knowingly false. Knowingly making a materially false statement or submitting knowingly false information may be addressed under applicable policy and law.

13. Mandatory reports and external options

Nothing in this policy delays or replaces any duty to report suspected child abuse or neglect, suspected criminal conduct, or an imminent safety threat to the

appropriate authority. Employees must comply with applicable mandatory-reporting requirements and School procedures. A person may also seek assistance from the appropriate state or federal agency. The School will provide current external contact information in its published complaint notice and will not interfere with a person's lawful right to make an external report.

14. Dissemination, training, and review

Walden will publish this policy on its website, make it available in appropriate handbooks and facilities, provide accessible copies upon request, and train employees on reporting, routing, non-retaliation, privacy, and applicable procedures. The Executive Director will review the policy at least annually and recommend updates when laws, rules, or School practices change.