

The Seattle School of Theology & Psychology Discrimination Grievance Procedures

1. **Purpose.** The purpose of these Discrimination Grievance Procedures (“**Procedures**”) is to provide a prompt and fair resolution of complaints or reports of discrimination, harassment, or retaliation in violation of The Seattle School’s Nondiscrimination, Harassment, Sexual Harassment, and Sexual Violence Policy (“**Nondiscrimination and Harassment Policy**”). Any person who believes he or she has been discriminated against, harassed, or retaliated against in violation of the Nondiscrimination and Harassment Policy may file a complaint or a report with The Seattle School. These Procedures are used to address all complaints and reports of alleged discrimination, harassment, or retaliation, including allegations of sexual harassment and sexual assault and other sexual misconduct. The terms “**discrimination**,” “**harassment**,” “**retaliation**,” “**sexual harassment**,” “**sexual misconduct**,” “**sexual assault**,” “**dating violence**,” “**domestic violence**,” “**stalking**,” “**other sexual misconduct**,” and other relevant terms are defined in the Nondiscrimination and Harassment Policy.

2. **Making Complaints and Reports.**

2.1 **Grievance Officers.**

A) Complaints and third-party reports of discrimination, harassment, or retaliation should be made to one of the following individuals (“**Grievance Officers**”):

Title IX Coordinator (currently Becca Shirley)
(206) 876-6137
bshirley@theseattleschool.edu
2501 Elliott Avenue
Seattle, WA 98121

Director of Human Resources (currently Kartha Heinz)
(206) 876-6131
kheinz@theseattleschool.edu
2501 Elliott Avenue
Seattle, WA 98121

B) If the complaint or report involves both of the Grievance Officers, then the complaint or report should be filed with the President of The Seattle School (who may designate an individual to investigate the complaint or report):

President (currently Dr. J. Derek McNeil)
(206) 876-6105
dmcneil@theseattleschool.edu

2501 Elliott Avenue
Seattle, WA 98121

- C) If the Grievance Officer originally contacted by a Complainant (defined in *Section 4*) reports directly or indirectly to the Respondent (defined in *Section 4*), then the matter will be referred to the other Grievance Officer. If necessary, the President may designate another individual to serve as a Grievance Officer.
- D) If the Respondent is the President, then the Grievance Officer will contact the Chair of the Board of Trustees.

2.2 **How to make a complaint or a report.**

- A) Complaints or reports may be made in person, by telephone, by voicemail message, by email, or by letter to one of the Grievance Officers.
- B) Complaints and reports about sex discrimination, sexual harassment, and sexual misconduct (including sexual assault) may also be made to another employee of The Seattle School who you trust, for example, a professor, administrator, or advisor. That individual will report the complaint or report to one of the Grievance Officers.

2.3 **Timing.** Complaints and reports should be made as soon as possible after an incident or suspected incident of discrimination, harassment, or retaliation (including incidents of sexual harassment, sexual assault, or other sexual misconduct).

- A) As required by the Nondiscrimination and Harassment Policy, all employees receiving any information about any alleged or possible sex-based discrimination, sexual harassment, or sexual misconduct (including sexual assault) involving a student, must report that information to a Grievance Officer within 24 hours of receiving that information.
- B) Students are strongly encouraged to report instances of sex-based discrimination, sexual harassment, and sexual misconduct (including sexual assault, dating violence, domestic violence, and stalking) involving any student.

2.4 **Anonymous reports and complaints.** Grievance Officers will accept anonymous and third-party reports. The person making an anonymous complaint or report is encouraged to provide as much detail as possible to allow the Grievance Officer to investigate the allegation and respond, as appropriate. The lack of sufficient information may limit the Grievance Officer's ability to conduct a meaningful and fair investigation.

2.5 **Others informed that a complaint or report has been received.** When a complaint or report of discrimination, harassment, or retaliation has been received, the following individuals will be informed:

A) If the complaint is from a student or involves a student as a victim, and the Title IX Coordinator did not receive the initial complaint or report, then the Grievance Officer will inform the Title IX Coordinator.

B) If the complaint or report involves an employee as a victim or the person accused of discrimination, harassment, or retaliation is an employee, and the Director of Human Resources did not receive the initial report, then the Grievance Officer will inform the Director of Human Resources.

3. **Crimes or Medical Emergencies.**

3.1 **Call 911 for emergencies.** Please immediately contact 911 if you or someone else is in immediate danger, if a crime has occurred, or if you or someone needs medical attention.

3.2 **Reporting a crime.** A victim has the option to notify law enforcement, be assisted by a Grievance Officer in notifying law enforcement, or decline to notify law enforcement. However, nothing in these Procedures prevents or prohibits any employee or student from contacting the police to report a crime, including a sexual assault.

3.3 **Law Enforcement Compliance.** If law enforcement become involved, The Seattle School will comply with the criminal investigation to a reasonable extent

3.4 **Preservation of Evidence.** A victim should make reasonable efforts to preserve evidence that may be necessary for the internal investigation or for law enforcement investigation.

4. **Confidentiality of Complaints and Reports.** The person who is the victim identified in a complaint or report (“*Complainant*”) and the person accused of violating the Nondiscrimination and Harassment Policy (“*Respondent*”) may have certain privacy rights or concerns. The complaint, report, investigation, and results will be kept confidential and shared only with the Complainant, the Respondent, witnesses (as deemed appropriate), and any employee or agent of The Seattle School with a reasonable need to know the information (for example a supervisor, the Title IX Coordinator, Director of Human Relations, the President, outside counsel). If the Complainant has concerns about having the Complainant’s identity or complaint or report disclosed to the Respondent, then the Grievance Officer should attempt to address those concerns. The Seattle School may also disclose any information or documents as permitted by the Family Educational Rights and Privacy Act, as required by law, or as necessary or

appropriate to make a report to any law enforcement agency. The Seattle School will make every reasonable effort to comply with a victim's desires for confidentiality.

5. **Request for No Investigation.** If a Complainant or a person filing a report asks that an investigation not be conducted, the Grievance Officer receiving the complaint or report will consider the reasons for the request, including concerns about the continued safety of the person reportedly harmed. The Grievance Officer must consider the safety of the other members of The Seattle School community against the Complainant's or reporter's desire not to have an investigation. When the Grievance Officer has any concern that not taking any action might endanger the health or safety of other members of the campus community, the Grievance Officer may have confidential discussions with appropriate individuals to determine how best to proceed. The Grievance Officer may consult with the President, the Senior Vice President for Academic Affairs, the Chief Financial Officer, any other Grievance Officer, any faculty member of Counseling Psychology, and outside general counsel. The Grievance Officer will then decide whether to conduct a formal investigation or respond to the complaint or report in another manner.

6. **Role of Grievance Officers.** The Grievance Officer is not an advocate for either the Complainant or the Respondent. The Grievance Officer has the following primary responsibilities:
 - 6.1 to receive any reports or complaints of discrimination, harassment, or retaliation;
 - 6.2 to provide information to the Complainant, as appropriate, about medical services, mental health or counseling services, victim advocacy, legal assistance and information about filing a police report (when there is an allegation that a crime has been committed);
 - 6.3 to explain the these Procedures to the Complainant and the Respondent, including the informal and formal processes and appeal rights, and to remind the parties and witnesses of the policy against retaliation;
 - 6.4 to investigate complaints or reports of alleged discrimination, harassment, or retaliation, including reports from third parties;
 - 6.5 to present findings and recommend appropriate remedies, sanctions, or corrective action to those responsible for making decisions about those matters; and
 - 6.6 to fulfill all other duties given to the Grievance Officer under these Procedures.

7. **Immediate Action and Interim Measures.** The Seattle School may take interim measures to assist or protect the parties during these Procedures, as appropriate (and with the Complainant's consent, if deemed appropriate). These interim measures for a student Complainant may include a no-contact requirement imposed on the Respondent, obtaining counseling, temporarily rearranging class schedules or class requirements

(whether for the Complainant or Respondent), and other appropriate actions. Interim measures may be imposed unilaterally, at any time. Initiation of interim measures does not require law enforcement notification.

8. **Resolution – Informal Process.**

8.1 **Agreement to attempt an informal resolution.** If the Complainant, Respondent, and Grievance Officer all agree that an informal resolution should be pursued, then the Grievance Officer (or his or her designee) will help facilitate a resolution that is mutually acceptable to all parties and the Grievance Officer. The Grievance Officer is only required to investigate the allegations to the extent useful to resolve the matter and to the extent necessary or appropriate to protect The Seattle School and the other members of the campus community. In most cases, an informal investigation should be completed within 5 business days after all parties have agreed to pursue an informal resolution. If more time is needed to investigate, both parties should be told of the need for additional time, with an estimate of when the informal investigation might be completed.

8.2 **Ending the process before resolution; initiating the formal process.** Either party or the Grievance Officer may end the informal process at any time. Either party may request the start of the formal process. The Grievance Officer (on his or her own initiative) may start the formal process at any time.

8.3 **Simultaneous Notification of Outcome.** Both the accuser and the accused will receive written notification of the outcome at the same time, and reminded about the availability of the formal process.

9. **Resolution – Formal process.**

9.1 **Step 1: Meeting with the parties; interim action (if appropriate).** The Grievance Officer will meet with the Complainant to understand the allegations and concerns, and explain these Procedures. The Grievance Officer will also meet with the Respondent to understand the Respondent's position and explain these Procedures. The Grievance Officer will also take any immediate action and impose any interim measures that might be appropriate. Immediate action and interim measures may be imposed by the Grievance Officer at any time, and not just at Step 1. If the allegation does not involve an alleged violation of the Nondiscrimination and Harassment Policy, the Grievance Officer will refer the matter to the appropriate department or staff member, if any.

9.2 **Step 2: Investigation.** The Grievance Officer will conduct or oversee a fair and impartial investigation of the alleged discrimination, harassment, or retaliation. The Grievance Officer may delegate the investigation to a designated investigator, who will be identified to both parties. The investigator may be an employee of

The Seattle School or an outside investigator (including an attorney). References to the Grievance Officer also include any designated investigator.

- A) On request, the Complainant will provide the Grievance Officer with a written statement of the allegations, including the identity and contact information for any witnesses and a description and copy of any evidence (for example a copy of letters, emails, text messages). The Grievance Officer may request that the written statement be provided within a certain period of time (usually 5 business days of the request). The Complainant may ask for additional time and should provide a reason for the request. The Grievance Officer may grant the request, if it is reasonable.
- B) The Grievance Officer will examine any evidence, interview witnesses (and may require written statements from witnesses). The Grievance Officer may structure the investigation and schedule interviews as the Grievance Officer deems appropriate, and is not bound to conduct the investigation in any particular sequence. For example, the Grievance Officer may decide to interview the Respondent before interviewing witnesses, or may decide to interview the Respondent after completing most of the investigation. The Grievance Officer may also have more than one interview with the parties or the witnesses.
- C) The Grievance Officer will meet with the Respondent and present the allegations and any relevant evidence. If the Complainant provided a written statement, the Respondent will be provided a copy of that statement. The Grievance Officer may redact the name and contact information of witnesses, if deemed appropriate. If the Grievance Officer determines it is appropriate, the Grievance Officer may redact other information. The Respondent will have an opportunity to respond to the allegations and evidence, and may identify witnesses and evidence. The Grievance Officer may require a written statement from the Respondent, including responses to specific allegations. Respondent's written statement will be provided by a deadline set by the Grievance Officer (usually 5 business days, but it may be longer, depending on extent of the allegations). The Respondent may request additional time to respond, but should provide a reason the request. The Grievance Officer may grant the request, if it is reasonable.
- D) The Grievance Officer will prepare a draft investigation report (but not including findings or recommendations). Both Complainant and Respondent will have an opportunity to review and respond to the draft report. The Grievance Officer will set a deadline for receiving responses from the parties (usually at least 5 business days).

- E) The Grievance Officer will then evaluate the evidence gathered, take into consideration the comments received from the Complainant and Respondent, and determine whether there is a “preponderance of the evidence” that the Respondent violated the Nondiscrimination and Harassment Policy. The Respondent is presumed not to have violated the policy unless a “preponderance of the evidence” supports a finding that a violation occurred. The term “*preponderance of the evidence*” means the evidence supporting a finding is more convincing than the evidence in opposition to it. The Grievance Officer may find that a preponderance of the evidence exists for one finding, but not for another. In considering whether a hostile environment exists, the Grievance Officer will look at the totality of the circumstances, considering not only whether the conduct was unwelcome to the Complainant, but also whether a reasonable person in the Complainant’s situation would have perceived the conduct as objectively offensive. The Grievance Officer will then prepare a final investigation report, including findings and recommendations, if any. The Grievance Officer’s final investigation report will be provided to the Complainant, the Respondent, and the Title IX Coordinator at the same time, along with information about appeal procedures. If the Respondent is an employee, a copy of the report will be given to the Director of Human Resources.
- F) An investigation based on an anonymous complaint or report will be modified by the Grievance Officer to the extent necessary, with the goal of conducting a fair and impartial investigation.

9.3 **Step 3: Findings and recommendations.**

- A) If the Grievance Officer finds by a preponderance of the evidence that the Respondent did not violate the Nondiscrimination and Harassment Policy, then both the Complainant and Respondent will be simultaneously advised of the outcome and Complainant’s right to appeal and the time to file an appeal. See *Section 10*.
- B) If the Grievance Officer finds by a preponderance of the evidence that the Respondent violated any part of the Nondiscrimination and Harassment Policy, then the investigation report will also include recommendations for steps to take to prevent the recurrence of the violation, for remedies (if appropriate) for Complainant, and for sanctions or corrective action for the Respondent (if appropriate). Both the Complainant and Respondent will simultaneously be advised of the outcome and their appeal rights. Both parties have the right to appeal any of the findings or recommendations (whether for preventative action, remedies, sanctions, or corrective action). See *Section 10*.

9.4 **Step 4 (No Appeal of Report):** If there is no notice of appeal filed within the permitted time period, and if there is a finding by a preponderance of the evidence that the Respondent violated any part of the Nondiscrimination and Harassment policy, then the following occurs.

- A) If the Respondent is a student, the report, findings, and recommendations, if any, will be provided to Chief Academic Officer. After reviewing the report, findings, and recommendations, the Chief Academic Officer will act on the recommendations. The Chief Academic Officer may accept some, all, or none of the recommendations, and may also impose other remedies, sanctions, or corrective actions, whether or not recommended. The Chief Academic Officer may interview the Complainant, the Respondent, or any witness, and may review any evidence, but the Chief Academic Officer is not required to do any of those things. However, if the Chief Academic Officer interviews one party, then the other party must also be interviewed. The Chief Academic Officer will prepare a written decision and provide a copy to the Complainant, Respondent, and Grievance Officer. Either party may appeal the Chief Academic Officer's decision to the President. If the Chief Academic Officer is the Respondent, then the President will fulfill the duties of the Chief Academic Officer under this section. Decisions of the President regarding the Chief Academic Officer may not be appealed. If the President is the Respondent, then the Chair of the Board of Trustees will fulfill the duties of the President under this section.
- B) If the Respondent is an employee, the report, findings, and recommendations will be provided to the Director of Human Resources (if the director is not the Grievance Officer) and also the Vice President of the area in which the Respondent is employed ("*Area VP*"). After reviewing the report, findings, and recommendations and consulting with the Director of Human Resources, the Area VP will act on the recommendations, and may accept some, all, or none of the recommendations, and may also impose other remedies, sanctions, or corrective actions, whether or not recommended. The Area VP may interview the Complainant, the Respondent, or any witness, and may review any evidence, but is not required to do any of those things. However, if the Area VP interviews one party, then the other party must also be interviewed. The Area VP will inform the Complainant, Respondent, and Grievance Officer of the decision. Either party may appeal the Area VP's decision to the President. If the Area VP is the Respondent, then the President will fulfill the duties of the Area VP under this section. Decisions of the President regarding an Area VP may not be appealed. If the President is the Respondent, the Chair of the Board of Trustees will fulfill the duties of the President under this section.

9.5 **Step 4 (following decision by the Grievance Discrimination Committee):** If there is an appeal from Step 3, and the Grievance Discrimination Committee has issued a decision (see *Section 10*), then the following occurs.

- A) If the Respondent is a student, the Grievance Officer's investigation report and the Grievance Discrimination Committee decision will be reviewed by the Chief Academic Officer. After reviewing the report, findings, and recommendations, the Chief Academic Officer will act on the recommendations. The Chief Academic Officer may accept some, all, or none of the recommendations, and may also impose other remedies, sanctions, or corrective actions, whether or not recommended. The Chief Academic Officer may interview the Complainant, the Respondent, or any witnesses, and may review any evidence, but is not required to do any of those things. However, if the Chief Academic Officer interviews one party, then the other party must also be interviewed. The Chief Academic Officer will prepare a written decision and provide a copy to the Complainant, Respondent, Grievance Discrimination Committee, and Grievance Officer. Either party may appeal the Chief Academic Officer's decision to the President. If the Chief Academic Officer is the Respondent, then the President will fulfill the duties of the Chief Academic Officer under this section. Decisions of the President regarding the Chief Academic Officer may not be appealed. If the President is the Respondent, the Chair of the Board of Trustees will fulfill the duties of the President under this section.

- B) If the Respondent is an employee, the Grievance Officer's investigation report and the Discrimination Grievance Committee's decision will be reviewed by the Director of Human Resources (if not the Grievance Officer) and the Vice President of the area in which the Respondent is employed ("*Area VP*"). After reviewing the report and decision and consulting with the Director of Human Resources, the Area VP will act on the recommendations, and may accept some, all, or none of the recommendations. The Area VP may also impose other remedies, sanctions, or corrective actions, whether or not recommended. The Area VP may interview the Complainant, the Respondent, or any witness, and may review any evidence, but is not required to do any of those things. However, if the Area VP interviews one party, then the other party must also be interviewed. The Area VP will inform the Complainant, Respondent, Grievance Discrimination Committee, and Grievance Officer of the decision. Either party may appeal the Area VP's decision to the President. If the Area VP is the Respondent, then the President will fulfill the duties of the Area VP under this section. Decisions of the President regarding an Area VP may not be appealed. If the President is the

Respondent, then the Chair of the Board of Trustees will fulfill the President's duties under this section.

10. **Appeal Procedure.**

10.1 **Appeal of an investigation report.** This appeal process applies to any appeal from Step 3 (see *Section 9.3*).

- A) The appeal from Step 3 must be made within 5 business days after receipt of the Grievance Officer's report. The notice of appeal must be filed with the Grievance Officer. The Grievance Officer may grant a reasonable extension of time for good reason, but generally, no extensions will be granted.
- 1) Contents of notice. The notice must be in writing (or in a pdf attachment to an email). The notice must describe the appellant's desired outcome, and a description of why the Grievance Officer's report is unfair or inappropriate. The Grievance Officer will provide a copy of the notice to the other party and to the Dean of Students and Alumni.
 - 2) The Discrimination Grievance Committee consists of the Dean of Students and Alumni, the Registrar, and a faculty member appointed by the President. If the Complainant or Respondent is a faculty member, then the faculty member appointed by President will be from a different department from that of the Respondent. The Dean of Students and Alumni will serve as chair and call a meeting of the Discrimination Grievance Committee as soon as practicable (at least within 5 business days after receiving the notice of appeal) to determine whether there are any time conflicts or conflicts of interest. Any committee member may request a replacement, and the replacement will be designated by the President.
 - 3) Within 10 business days after receipt of the notice of appeal, the committee will send out a notice of hearing to both parties, including the time, date, and location of the hearing, along with any time deadlines for providing evidence or time limits for presenting each party's case. If no deadlines are mentioned, then evidence may be submitted at the hearing, and each party will be allowed 60 minutes to present the party's case. The hearing should normally be scheduled to take place within 30 days after receipt of the notice of appeal, but this period may be adjusted depending on periods between academic semesters. If deemed appropriate for complex matters, the committee may require a prehearing conference to organize the hearing, or to set

any limits, deadlines, or requirements that are different from what is required by this *Section 10.1*.

- 4) At least 10 days before the scheduled hearing, appealing party will provide to each committee member and the Grievance Officer the following statement and materials (which the Grievance Officer will forward to the non-appealing party):
 - a) a detailed statement of facts relevant to the complaint or report of discrimination, harassment, or retaliation;
 - b) the names and anticipated testimony from witnesses to be called;
 - c) copies of any relevant documents or other evidence that will be offered;
 - d) any other information the party believes is relevant for the committee to consider; and
 - e) the reason any finding, remedy, or recommendation is not appropriate.

- 5) At least 5 days before the scheduled hearing, the non-appealing party will indicate whether the party will be present and will provide the following statement and materials to each committee member and the Grievance Officer (who will forward a copy to the appealing party):
 - a) a detailed statement of facts relevant to the complaint or report of discrimination, harassment, or retaliation;
 - b) the names and anticipated testimony from witnesses to be called;
 - c) copies of any relevant documents or other evidence that will be offered;
 - d) any other information the party believes is relevant for the committee to consider; and
 - e) the reason any finding, remedy, or recommendation is or is not appropriate.

- 6) The chair of the committee will conduct the hearing. The parties may not have legal counsel present unless the hearing involves dating violence, domestic violence, sexual assault, or stalking; in those hearings parties may bring an advisor (meaning an individual who

provides support or counsel) of their choice, though no attorney may participate in the hearing. In all hearings the Grievance Officer will determine the permitted level of involvement of the advisor, with limitations applying equally to both parties. Legal counsel for The Seattle School may be present to assist the chair and the committee regarding the conduct of the hearing. Strict rules of evidence will not be applied, but the chair may limit or refuse to allow any evidence or testimony that does not appear to be reasonably related to whether or not a violation of the Nondiscrimination and Harassment Policy has occurred. The parties will address the committee and not one another. The chair will be the final arbiter of all procedural matters. The hearing will be closed to the public.

- 7) Within 10 business days after the end of the hearing, the Discrimination Grievance Committee should simultaneously submit a decision in writing to the parties, the Grievance Officer, and the Chief Academic Officer (in the case of a student Respondent), and the Director of Human Resources and the appropriate Area VP (in the case of an employee Respondent). The written decision should contain the following:
 - a) a summary of the allegations;
 - b) a summary of the response to the allegations;
 - c) a statement of the relief sought by the Complainant, if known, and the recommendations, if any, of the Grievance Officer;
 - d) the portion of the Nondiscrimination and Harassment Policy alleged to have been violated;
 - e) an analysis of the Grievance Officer’s investigation report, including findings and recommendations;
 - f) the committee’s findings and recommendations, if any, regarding remedies for the Complainant and sanctions or corrective action for the Respondent.
- B) Within 10 business days of receiving the Discrimination Grievance Committee’s decision, the Chief Academic Officer or appropriate Area VP will take the action required by Step 4, in *Section 9.5*.

10.2 **Appeal of a decision under Step 4 (*Sections 9.4 and 9.5*)**. Decisions of the Chief Academic Officer and the Area VP may be appealed to the President.

- A) The notice of appeal must be filed with the Grievance Officer and the President by the appealing party within 5 business days after receipt of the decision by Chief Academic Officer or Area VP. The notice of appeal must contain a statement describing the appellant’s desired outcome and why the decision is unfair. The Grievance Officer will provide a copy of the notice to the non-appealing party, and will also provide the President a copy of the investigation report, the Discrimination Grievance Committee’s decision and the decision of the Chief Academic Officer or Area VP.
- B) Within 5 business days after receipt of the notice of appeal, the non-appealing party may submit a statement responding to the notice of appeal. This response must be filed with the Grievance Officer and the President. The Grievance Officer will provide a copy of the response to the appealing party.
- C) The President will review all submitted documents, including the investigation report, the Discrimination Grievance Committee’s decision, the decision of the Chief Academic Officer or Area VP, the notice of appeal, and the response to the notice of appeal. The President may interview the Complainant, the Respondent, and any witness, and may review any evidence, but is not required to do any of those things. But if the President interviews one party, then the other party must also be interviewed. The President may accept, reject, or modify the decision of the Chief Academic Officer or Area VP, and may also impose other remedies, sanctions, or corrective actions, whether or not recommended. The President will issue a written decision and will provide a copy to the parties, the Grievance Officer, the Discrimination Grievance Committee (if involved), the Title IX Coordinator, the Director of Human Resources (in the case of an employee Respondent), and the individual whose decision was appealed. The President’s decision is final and may not be appealed.

10.3 **President as Respondent.** If in any situation the President is the Respondent, then the Chair of the Board of Trustees will fulfill the duties of the President under these Procedures.

11. **Interpretation of these Procedures.** The President may interpret or clarify these Procedures as the President deems appropriate to accomplish the intent of these Procedures.

12. **This Policy Does Not Change “At-Will” Employment or Employment for a Term.** Nothing in these Procedures changes the “at-will” employment policies of The Seattle School. Employees employed “at will” may be terminated at any time, with or without

cause and with or without prior notice. For faculty employed on contracts for a term, nothing in this policy changes The Seattle School's right to not renew any contract at any time, with or without cause.

13. **External Complaints.** If a Complainant files a complaint or makes a report under these Procedures, and the Complainant believes the response of The Seattle School is inadequate, or the Complainant believes The Seattle School has discriminated against the Complainant on the basis of race, color, national origin, ethnicity, sex (including sexual harassment and sexual assault), disability, age, or that The Seattle School has retaliated against the Complainant, the Complainant may file a complaint with the Office of Civil Rights of the U.S. Department of Education based in Seattle or the Educational Opportunities Section of the Civil Rights Division of the U.S. Justice Department.