Colorado Academy Summer Day Camp

Counselor Handbook



Summer 2023

Introduction

Colorado Academy has offered summer activities for metro area youth since 1951. Young people come from as far as Castle Rock, Evergreen and Parker, and a sizeable number of them are not campers at Colorado Academy during the academic year. Summers at CA are much less formal. There is plenty of time for fun while being challenged either intellectually, physically, or both.

Goals and Objectives

• To offer enriching, challenging, and satisfying summer experiences for metro area children.

• To provide a safe, secure and supportive environment in which each child feels confident to explore, play and learn.

- To treat each child with respect, honesty, kindness and good will.
- To enable each child to feel satisfied and fulfilled by his or her experience here every day.

Purpose of Staff Handbook

Welcome! This staff handbook is a source of information about employment at Colorado Academy as a staff member of Summer Programs. This has been prepared to provide you with information on your responsibilities as a staff member, the daily operation of the program, and other important information.

Summer Programs follows regulations of the Colorado Department of Human Services which provide standards for certain activities, services, and facilities for child care day centers. The purpose of the standards is to protect children. All employees of Summer Programs are responsible for ensuring compliance with the Department of Human Services regulations and with the policies and procedures found in this handbook.

Please take time to carefully go through and read the pages that follow. All staff members are expected to read and understand the handbook. If any questions come to mind, please ask.

We look forward to an exciting summer, and with your help I know we can provide our campers with a challenging and fun-filled eight weeks.

Equal Employment Opportunity and Nondiscrimination

A. Equal Employment Opportunity

Colorado Academy does not discriminate or allow unlawful harassment in any of its programs, procedures or practices on the basis of age, color, disability, national or ethnic origin, political affiliation, race, religion, gender, sexual orientation, gender identity, military service, or other protected classifications defined by the State of Colorado and local laws. The policy applies in all aspects of employment with the Academy.

B. Policy Against Discrimination and Harassment

All employees are expected to treat all members of the Academy community – fellow employees, campers, teachers, parents, guests, and volunteers – with respect. Offensive speech and conduct is prohibited, and will result in discipline or termination, regardless of whether that speech or conduct constitutes harassment or discrimination under this policy. However, because of both the Academy's commitment to equal employment opportunity and its legal obligations, behavior which constitutes discrimination or harassment will be dealt with particularly severely.

- 1. Zero Tolerance
- The Academy strives to provide a workplace free of discrimination or harassment of employees by supervisors, co-employees and third parties. Discrimination or harassment of any kind will not be tolerated and will result in discipline, which may include termination.
 - 2. General Harassment Defined

Unlawful harassment includes verbal or physical conduct that has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. Actions based on an individual's age 40 and over, race, sex, sexual orientation, gender identity, color, religion, national origin, disability, genetic information, military service or any other applicable status protected by state or local law will not be tolerated. Prohibited behavior may include but is not limited to the following:

- Written form such as cartoons, e-mail, social media, posters, drawings, or photographs.
- Verbal conduct such as epithets, derogatory comments, slurs, or jokes.
- Physical conduct such as assault, or blocking an individual's movements.

This policy applies to all employees including managers, supervisors, co-workers, and non-employees such as parents, clients, vendors, consultants, etc.

3. Sexual Harassment - Defined

Colorado Academy strongly opposes sexual harassment and inappropriate sexual conduct. Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature, when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment.
- Submission to or rejection of such conduct is used as the basis for decisions affecting an individual's employment.
- Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

All employees are expected to conduct themselves in a professional and businesslike manner at all times. Conduct which may violate this policy includes, but is not limited to, sexually implicit or explicit communications whether in:

• Written form, such as cartoons, posters, calendars, notes, letters, e-mail.

• Verbal form, such as comments, jokes, foul or obscene language of a sexual nature, gossiping, or questions about another's sex life, or repeated unwanted requests for dates.

- Physical gestures and other nonverbal behavior, such as unwelcome touching, grabbing, fondling, kissing, massaging, and brushing up against another's body.
- 4. Procedure for Reporting

If you believe you have been the subject of sexual or other harassment by any employee or person at the Academy, you should report the alleged conduct immediately to the Summer Program Director.

If you feel uncomfortable reporting to the Director, or if the harassment continues despite previous reporting, you should contact Human Resources/Payroll Manager, the Business Manager/CFO, or any member of the Academy's administration with whom you feel most comfortable.

The Academy expects employees to make a timely complaint to enable the school to investigate and correct any behavior that may be in violation of the policy. All complaints will be investigated in a timely and impartial manner. All persons involved in an investigation are required to maintain confidentiality about the matter to the greatest extent possible. However, it may not be possible to maintain complete confidentiality while conducting a complete investigation.

Every report of perceived harassment will be investigated and corrective action will be taken where appropriate. The Academy absolutely prohibits any form of retaliation against individuals who report unwelcome conduct to the administration, or who cooperate in the investigation of such reports in accordance with this policy.

If you have any questions about this policy or its application, you are encouraged to contact the Human Resources/Payroll Manager.

C. Infectious Disease Policy

Colorado Academy recognizes that serious infectious illnesses contracted by employees—such as HIV, tuberculosis, etc.—not only have a potentially tragic impact on those who contract them, but also pose potentially significant and sensitive issues for the members of our school's community. Accordingly, we have established this policy for dealing with employment issues in connection with infectious illnesses. Employees who have contracted a serious infectious illness are encouraged (but not required) as members of the school community to inform the Director of their illness. An employee who has contracted an infectious illness will continue to work so long as he/she:

- Does not pose a substantial health risk to themselves, to campers, or to any member of the school community;
- Is able, with reasonable accommodation, to perform the essential duties of their position. The Americans with Disabilities Act addresses the challenge of determining what constitutes "reasonable accommodation."

All decisions concerning an employee's fitness to work will be made on an individual basis by the Director in consultation with appropriate medical personnel.

Only persons with a need to know shall have medical knowledge of a particular case. The Director, in consultation with the infected employee, will determine who will be informed and how to preserve confidentiality. All employees, whether they are officially informed or become aware of the situation through other means, will be expected to continue to work with an employee with an infectious illness, once the school has determined that the individual does not pose a threat to the health and safety of others. The employee with an infectious condition should be treated with compassion and understanding. School employees will not harass or otherwise discriminate against this individual. Any employee who does not adhere to these requirements is subject to disciplinary action.

Colorado law requires the school to report certain diseases and conditions to the Colorado Department of Public Health and Environment for surveillance and disease control purposes. For more information about diseases and conditions that must be reported to the state, please see https://www.colo-rado.gov/pacific/cdphe/report-a-disease.

It is the policy of the Academy to comply with the Americans with Disabilities Act ("ADA"). Therefore, if an employee notifies the Academy that they have a disability (as defined in the ADA), which prevents him/her from performing one or more of the essential functions of the job, the Academy will work with the employee to try and identify a "reasonable accommodation" that will enable the employee to perform such functions. If you have a disability and would like to discuss possible accommodations, contact the Human Resources/Payroll Manager. The Academy may request medical certification of any disability for which accommodation is requested, and/or of the need for accommodation.

If you have any questions about your responsibilities under the ADA, the meaning of terms used in this policy, or the application of this policy or the ADA, you should contact the Human Resources/Payroll Manager

A Document Subject to Change

Practices, policies, benefits, and procedures at Colorado Academy are subject to change and further development in light of experience, changing demands of our operations, and government regulations. For this reason, the Academy's practices, policies, and procedures are under review on an ongoing basis and may be modified, altered, or eliminated at any time, with or without notice to employees, in the Academy's sole discretion.

We will attempt to keep employees up to date regarding changes that affect them. No member of the administration other than the Head of School and their designated representatives has the authority to change anything in the policy book or to make promises or commitments which conflict with, or are at variance with, the Employee Policy Book.

Program Policies and Procedures

Bullying, Harassment

Colorado Academy is dedicated to fostering an environment that promotes kindness, acceptance, and embraces differences among individuals. Therefore, the school will not tolerate any type of harassment or "bullying" against any person for any reason. Harassment includes, but is not limited to: slurs, jokes, comments, teasing, and other offensive conduct relating to race, religion, color, gender, sex, sexual orientation, ethnicity, national origin, citizenship, or disability. Harassment

also includes unwanted, offensive sexual conduct. Bullying includes, but is not limited to: physical or verbal aggression (hitting, kicking, taunting, teasing, threatening, ridiculing, etc.), relational aggression (harming or threatening to harm relationships or acceptance, friendship, or group inclusion), emotional aggression (teasing, threatening, intimidating others).

Bullying or harassment can occur via any type of method, including face-to-face communications, phone, text, email, postings on social media, (Facebook, Instagram, etc.), camera phones, or other forms of technology.

Child Abuse, Mandated Reporting

The State of Colorado mandates that individuals working in child care programs have responsibilities in protecting children from abuse and neglect. This mandate applies to all employees in Summer Programs. Specifically, any Summer Programs employee who has reasonable cause to know or suspect that a child has been subjected to abuse or neglect or who has observed the child being subjected to circumstances or conditions that would reasonably result in abuse or neglect shall immediately upon receiving such information report or cause a report to be made of such fact to the county department of social services or local law enforcement agency. Colorado Academy requires all employees to abide by this law. Employees should notify the Director as soon as possible if the employee believes there to be grounds for making a report.

Child Not Picked Up from Camp

• Campers not picked up by 3:45 pm are taken to the After Camp center.

• Should the parent not arrive in a reasonable amount of time, the After Camp staff will follow the procedures outlined below.

- Attempts are made to reach either parent by telephone and cell phone if available.
- If unsuccessful, the child's camp application is referred to and alternate adults who have volunteered to accept responsibility are contacted.
- Should all of the above prove fruitless, after several hours upon close of After Camp program, the camp Director would notify the local police department.
- The After Camp staff will also notify the camp director, at home, of the problem.

Complaint about Child Care, Filing

Should a parent/guardian or staff member wish to file a complaint concerning suspected licensing violations on the part of Colorado Academy Summer Day Camp, they may do so by contacting:

Division of Child Care The Colorado Dept. of Human Services 1575 Sherman St. Denver, CO 80203-1714 (303) 866-5958

Discipline

Occasionally, campers will need to be reminded about expectations and consequences of behavior. Counselors are the primary adults who monitor the behavior of children at camp. They set the tone and expectations for behavior. Both expectations and consequences should be age and developmentally appropriate. Counselor are encouraged to seek the assistance of the Assistant Director or Director.

All behavioral issues are handled on a case-by-case basis, with thought given to individual needs and circumstances, support provided by parents, and a variety of other factors. On some occasions, a camper will meet with the Assistant Director or Director and a note may go home or a call be made to parents explaining the infraction. In cases of repeated offenses, the school may send a camper home.

Guidelines to Remember:

• At the time of hiring, during staff orientation, and regularly during the camp season, all counselors are reminded of the appropriate treatment of children.

• Discipline must be appropriate and constructive or educational in nature and may include such measures as positive behavior management such as specific reinforcement, building routines with campers, empower and reinforce positive actions, logical consequences.

• Children must not be subjected to physical or emotional harm or humiliation.

• Corporal or other harsh punishment, including but not limited to pinching, shaking, spanking, punching, biting, kicking, rough handling, hair pulling, or any humiliating or frightening method of discipline is **absolutely** forbidden.

- Punishing a child for toileting accidents is forbidden.
- Food must not be denied to or forced upon a child as a disciplinary measure.

• "Sitting out", when used as discipline, must be brief, logical, and appropriate for the child's age and circumstances. The child must be in a safe, lighted, well-ventilated area and be within hearing and vision of a staff member. The child must not be isolated in a locked room, bathroom, closet, or pantry.

- Verbal abuse and derogatory remarks about a child are not permitted.
- Counselors are never to allow one child to punish another child.

Dismissal, Unauthorized Pickup Procedure

- If someone other than a parent, guardian, or other authorized person attempts to have a child released to them, the counselor or staff member involved will immediately escort the individual to the camp office.
- An office staff person will contact the parent/ guardian and seek verbal authorization for the release.
- Upon authorization and appropriate checking of identification, the camper may be released.
- Should the parent/guardian be unavailable, the office will not allow the release and will retain the camper until appropriate arrangements can be made.

Field Trips

• The day camp does not sponsor regular field trips. Specialty camps take pre-arranged trips to different destinations.

Heat Illness

• Heat illness is a serious threat during active play in hot weather. Watch for symptoms such as cramps, tiredness, decreased alertness, confusion, and belligerence. Should such signs occur, stop the activity and bring the child to the office.

• Be sure campers drink water frequently throughout the day to prevent heat illness.

Identifying Where Children Are at All Times

- Determine the color group of the child.
- Consult the camp master schedule to see in which activity the group is participating.
- All activities meet at regular locations. Any changes are made public during morning staff announcements each day.

Inclement and Excessively Hot Weather

• During inclement weather, a rainy-day schedule is used. Please refer to Rain Day Schedule. • During unusually hot spells, fewer active games are played, and more time is spent in the shade around campus.

Lost children and other emergencies

Notify Director immediately. The Director will notify the Director of Security immediately. See Emergency Response Plan.

Meals and snacks

- Each camp day, the school dining hall offers a hot meal, and a salad bar. All campers are encouraged to eat a well-balanced meal.
- At the end of each camp day, a snack treat is offered to each camper.
- Participants in the 4 and 5-year-old programs also receive a morning snack.
- If for medical reasons, a camper needs to bring his/her own food to camp, it will be stored in the dining hall cooler as needed. If the food is non-perishable, the camper may carry it during the day.
- CA Summer Programs is a nut free environment.
- Campers are encouraged to bring nut-free snacks to camp.

Medications, Storing and Administering

- Medication, either internal or external, cannot be administered to any child unless the camp has written authorization from both the child's doctor and the child's parents/guardians.
- Parents must provide all medications, including over-the-counter medications. All authorized medications will be stored, under lock and key, in the camp office. Emergency medications will be stored in an unlocked area of the health office and will be accessible at all times.
- Only staff members that have had training to administer medicine are allowed to dispense medications to children. These individuals usually include: director, assistant director, office assistant.
- A written record of each medication given and each time it is given will be kept.

Personal Belongings and Money Belonging to Campers

- Campers' personal belongings will be stored in the lockers in the boy's and girl's locker rooms. Participants in the 5-year-old program have storage spaces in the room they use.
- Since the lockers have no locks, campers are requested to not bring valuable items to camp.
- Money is not needed at camp.
- Should a camper need to carry money or other valuable items for special reasons, it must be left in the camp office during the day.

Playground Safety Rules

Summer Programs staff will review all playground rules with the campers.

- Children must use the ladder to climb up the slide and slide down the slide sitting up.
- Children are not permitted to climb up the slide.
- Campers above grade 4 are not permitted on the slide while younger children are also playing.
- Running near the swings and tire swing is not permitted. Keep campers far enough

away so the swings, or campers swinging, do not hit anyone.

• Soccer balls, rubber balls, and Nerf balls are permitted with the approval of the Director.

- Children may not climb on, over, under, or through any fence.
- Children will remain in view of the staff at all times.
- Permission to go inside for the use of bathrooms or water fountain is required.
- No guns, swords, knives, or other weapons of any kind (real, play or pretend) are permitted on Colorado Academy school site property.

• All campers will respect each other, respect the staff, respect the equipment, and play fairly. Disputes will be resolved with discussions and compromises, as directed by the staff when necessary.

• Campers are required to clean up the outdoor area, bring in any balls, sand toys, etc., before leaving the playground.

• Campers must remain seated while eating snacks, and deposit all trash in trash cans. • Other appropriate rules may be made, if needed, at any time, by staff.

Playground Safety Plan

- All staff members are provided with the playground safety rules.
- Staff members should check daily for debris, hazardous elements, broken glass, etc. and inform the Director if a cleanup of the playground is required.

• Staff members on duty should walk around and maintain constant supervision. Notify the Director of any maintenance problems.

• Director will complete a weekly playground inspection.

Scheduling Activities and Groups (Color Group Camps)

When dividing a color group into sections head counselors must keep both sections to a fairly even size unless it is a situation where campers can choose:

- They must also pay close attention to the roll call sheets to be sure that parent requests to place friends with friends are met.
- Division of a group is also a good opportunity to break up small groups of less than cooperative campers
- Unless the overall size of the group is less than 20 campers, head counselors are expected to form two sections for each activity and to use both activity periods each day

The Director or Assistant Director for Program must approve any changes to these policies.

Special Needs Children, Services Offered

• Special needs children are considered for camp on an individual basis. A primary concern of the Camp is the safety of both the individual involved and all other campers.

• Should the special need require, in the opinion of the camp's director, additional staffing beyond our standard 1-10 ratio, or beyond the expertise of our mostly college camper counseling staff, the additional expense will be assumed by parent/guardian of the camper.

Staff Development

• Each year all color group staff members are required to undergo a 15-hour orientation program to learn camp procedures and policies. Staff are also required to participate in several online courses required by state licensing. Specialty Camp teachers are required to attend a Boundaries/Supervision class as well as a Medical Orientation with our Camp Nurse.

• The Coordinator will be responsible for familiarizing newer staff with the day-to-day operation of the camp and with methods for dealing with children positively and successfully.

• The assistant directors for the program will meet regularly with all staff members to discuss successful behaviors and procedures.

The camp maintains an apprentice counselor program for teens aged 13-15. Participants in this program are trained in camp procedures and policies by group leaders, the assistant director for program, and the camp director. Apprentice counselors are not considered as full members of the camp staff and are listed as campers in camp records, nor are their numbers used in maintaining appropriate counselor/camper ratios.

Sun Protection

- Counselors are to pay particular attention to be sure campers are not getting too much sun. Sunscreen may be applied <u>only</u> to children for whom parents have given written authorization.
- Sunscreen will be administered by counselors when a child is too young to safely cover sun exposed areas.
- Sunscreen containers must be labeled with the child's first and last name.
- Children may apply sunscreen to themselves under direct supervision of a staff member.
- All counselors are encouraged to wear sunscreen as well. Sunscreen is available in the office.

Supervision

A. The Rule of Three

- Staff shall never leave any child unattended
- Staff shall never be alone with any one child
- Staff shall always be in a group of a minimum of 3 individuals such as one staff member and two campers or two staff members and one camper
- As staff supervise children, they should space themselves in a way that other staff can see them at all times

B. Restroom Supervision & Usage

Staff will ensure:

- The restroom is not occupied by suspicious or unknown individuals before allowing children to use the facilities
- Children are with an adult staff member and proceed in groups of three or more when using the bathroom
- Either line of sight or line of sound supervision is maintained while children are using the facilities
- If a child enters the bathroom alone, staff member should stand in the hallway with the door to the bathroom entrance open in order to ensure line of sight or sound. If possible, use a single stall bathroom
- If staff are assisting children with bathroom needs, the door to the bathroom entrance will remain open
- Staff should conduct or supervise private activities in pairs-diapering, putting on bathing suits, taking showers, etc.
- All Colorado Academy employees and campers have the right to use the restroom appropriate to their gender identity. Additional privacy in locker rooms, and single-occupancy/gender neutral (unisex) facilities, are available for all employees and campers who desire more privacy.

Swimming Pool Use Guidelines

- NEVER allow campers to swim without a lifeguard present.
- NEVER allow dunking, running, towel flipping, or other dangerous behaviors. Food

is not allowed in the swim area.

- Watch for chilling and/or sunburn.
- Insist on NO yelling for help unless truly needed.
- When whistle blows, there must be no talking, all campers must listen for instructions.

• Only campers who have passed level 3 of the Red Cross Instruction Program may use the deep end of the pool during free swim.

- Swimsuit changing procedures:
 - Each camper is encouraged to keep track of his/her own clothing, and younger campers are given a grocery bag to transport clothing if they change in the restrooms.
 - After getting changed, have campers line up to get sunscreen from responsible staff member.
 - Make sure bathroom or locker area is picked up and all clothing stowed in lockers before leaving for pool.
 - At least two adults must be near campers as they change. DO NOT LEAVE bathroom area UNSU-PERVISED. (Supervising staff members change after campers have left.)

Television and Video Viewing

Television viewing is not a regular camp activity.

Transportation of Campers

Safe and dependable transportation is a priority. Full cooperation from passengers is required. If a bus driver considers a child's conduct to be unsafe, the driver will report this to the Director.

Colorado Academy Bus Rules of Safety and Conduct

The driver has full responsibility for the safe operation of the bus. Therefore, campers must comply with driver requests.

Campers must be on time and ready to board the bus when the bus arrives. In fairness to those who are on time, drivers are instructed not to wait for late riders.

Campers must remain seated on the bus until it is time to exit.

Campers shall observe classroom conduct on the bus.

Rough play and behavior such as the following is prohibited.

Treating Children's Illnesses, Accidents, and Injuries, Including Notification of Parents and Guardians

Campers suffering minor injuries and illnesses are to be brought to the health office where the following procedures will be observed.

- Treatment (such as ice and Band-Aids), not to include medication, will be given. Coun-
- selors treating wounds involving blood must wear rubber gloves.
- The child will be encouraged to lie on a cot if the situation warrants it.
- An entry will be made in the camp medical log.
- If the situation calls for it, or the child requests, parents will be notified by the camp office staff.
- A basic first-aid kit containing Band-Aids, gloves and baggies for ice will be given to each counselor to be stored in his or her backpack to be used when it is more convenient to treat minor wounds in one of the bathrooms on campus.

In the case of a severe injury the following procedures are to be followed.

- The child is not to be moved unless a greater danger is present.
- The health assistant, camp office staff and the Director are to be notified immediately.
- Any counselor at the scene is to render immediate assistance.

- A staff member qualified in CPR/first aid is to be notified immediately and to report to the scene and render aid.
- The health assistant on campus will be called for assistance.
- The camp office staff or health assistant will dial 911 and seek immediate outside assistance.
- The camp office staff or health assistant will notify the parents involved and keep them up to date as information is gathered.
- Should a trip to an emergency room be required, a camp employee will ride in the emergency vehicle and a member of the camp office staff will follow in a car. Parents will be asked by the camp office staff their preference of hospital and will be asked to meet the emergency vehicle at the hospital.
- The staff member going to the hospital will pick up the medical release form (on the camper's application form) from the camp office before leaving.
- As soon as possible the camp office staff will complete an accident report form with the help of all witnesses to the injury.
- The camp office staff shall report in writing to the Licensing Section of the State Department of Social Services immediately any accident or illness which resulted in medical treatment, hospitalization or death. This report shall be made within 48 hours after the accident or illness occurred. The report shall be made in accordance with State Regulation 7.712.54 section C.

Visitors

- Visitors to Summer Programs (not visitors to Colorado Academy), must sign in at the camp office.
- The sign-in must include name, address, and purpose of visit.
- The camp office will maintain a record of all visitors to the camp.

Volunteers

- Occasionally the camp accepts volunteers to work with children.
- Volunteers are expected to meet all state registry requirements, e.g., record checks.
- Director interviews each volunteer and determines their fitness to serve, as well as inform each of the standards of the camp.
- Volunteers are not counted in maintaining a proper camper to counselor ratio.
- Volunteers are expected to maintain the safety standards of the program and to positively support, and to assist counselors in working with campers.

Workplace Policies and Procedures

General Staff Expectations

- Arrive at work by 8:15 am.
- You will be given a drop-off and pick-up responsibility. Take attendance daily.
- All notes from parents about campers must be turned in to the Camp Office
- Keep to the daily schedule. Be on time for all activities and meals
- Make every effort to get campers to the extra activities they have signed up for. Inform the camp office if a camper will not be attending their extra activities.
- Take care of all camp equipment
- Return all equipment used to camp office
- Be sure lunch table is cleared and wiped off
- Follow all supervision guidelines, especially in areas such as restrooms and locker rooms Keep miscellaneous trash picked up
- Keep locker rooms picked up
- Have campers wash hands before lunch

- When walking with campers, position one counselor in front of the group, and one counselor in back.
- Always stay in a group of a minimum of 3 individuals: ie: one staff member and two campers or two staff members and one camper
- Take attendance counts often during the day
- Keep all roll call lists away from campers' eyes, they often contain personal information about campers
- Constantly monitor radio contact with camp office

Camp Guidelines for Working with Children

- Busy kids are happier than kids with little to do
- Busy kids do not have time for mischief
- Build an inclusive environment
- Kids have short attention spans, vary activities
- Be patient and flexible
- Avoid put downs, do say things that make campers feel good about themselves NEVER strike or yell at a camper
- Refer all serious behavioral difficulties to the Director or Assistant Director Teach kids how to properly play all games
- Avoid exercising special staff privileges in front of campers
- NEVER leave children unattended
- Camp motto is "Give your child a summer to remember." Do everything you can to make each camper's time at C.A. a terrific experience
- It's camp, not a school. Campers having fun in a safe environment is the number one goal
- Always be involved in what the campers are doing. If you are just watching, you are not doing your job.

Attendance/Absences

Satisfactory attendance at work by all employees is necessary for the successful operation of the camp program. You are expected to be at work during scheduled hours and on scheduled days. Colorado Academy Summer Program employees will earn paid leave at the rate of one hour per 30 hours worked up to 48 hours. Employees can use accrued leave for the following safety or health needs:

- 1. A mental or physical illness, injury, or health condition that prevents work, including diagnosis or preventive care;
- 2. Domestic abuse, sexual assault, or criminal harassment leading to health, relocation, legal, or other services needs;
- 3. Has a family member experiencing a condition described in (1) or (2) above; 4. In a public health emergency, a public official closed the workplace, or the school or place of care of the employee's child.

In the event that a public health emergency is declared due to a communicable disease, employees who work at least 40 hours a week are entitled to up to 10 days (80 hours) of supplemental leave. Employees who work less than 40 hours per week receive supplemental leave equal to the greater of: the number of hours the employee is scheduled in the upcoming 14-day period; or the number of hours actually worked on average in the 14-day period prior to the public health emergency.

Unused paid leave is not paid to employees upon termination of employment.

If you must be absent due to illness or some other emergency, you are expected to notify camp administrators as soon as possible. If you will be absent or delayed in arriving to from camp, call the Director's cell at 303-359-3387. This will allow us to make arrangements to keep camp operations running smoothly in your absence. Employees absent for four consecutive days without notifying camp administration or are unable to provide reasonable documentation to support the reason for the leave, are considered to have abandoned their job and voluntarily resigned their employment.

Background Review

You must be fingerprinted in accordance with child care licensing regulations. Your fingerprints are submitted to the Colorado Department of Human Services for review of criminal records and child abuse history. A check of the National Sex Offender Public Registry will also be conducted. All offers of employment are contingent on the results of this review.

Behavior

Behavior at Colorado Academy Summer Programs is based on respect for the rights of others, kindness, awareness, safety, and pride in our program. Behavior is governed by two rules: you cannot hurt yourself, and you cannot hurt others. More than that, however, our expectations of counselor conduct are aligned with the concepts of character development that underlie all of our guiding principles for children. All Summer Program employees are expected to act with integrity and to demonstrate the following characteristics:

- **Respect** Uses good manners. Be considerate and polite to others.
- **Responsibility** Takes care of self and belongings and can be counted on by others.
- Honesty Truthful in the things we say and do.
- Kindness Nice to others.
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- **Good Citizenship** Doing things which are helpful to your campers, families, and to your co workers.
- Look professional at all times. Be involved with children, do be enthusiastic, and do be careful.

Camper and Counselor Interactions

Summer Program employees are comprised of compassionate, generous and caring people who have a sense of their professional responsibilities and of the significant roles they play as models for the children and adolescents. At the heart of good camper and counselor relationships is the building of relationships of with the campers. Those relationships create an environment conducive to learning, serve as a model of ethical and caring adult behaviors, and provide children with a safe and stable context from which they can manage their growth in security Contact with campers should always be restricted to your professional duties in situations capable of broad supervision in group settings. Appropriately supportive relationships between campers and counselors foster learning. It is the camper's and the counselor's responsibility to respect boundaries appropriate to this relationship. Communication should be limited to school hours. Campers should refrain from texting or communicating with counselors using social media. Similarly, counselor-camper contact should be limited to the camp day. Any unwanted or inappropriate contact or communication between counselor and camper should be reported immediately to the appropriate camp director.

Some behaviors that should not occur and which should be reported are listed below. An employee or volunteer should not:

- Call campers at home for matters outside of school, co-curricular, or extra-curricular activities.
- Touch campers or their clothing in non-professional ways or inappropriate places, or touch a camper with aggression or in frustration.
- Make personal comments (about a camper's clothing, hair, personal habits, etc.)
- Send emails, texts, or notes to campers of a personal nature.
- Flirt or ask a camper on a date.
- Ask campers to sit on a counselor's lap.
- Tell secrets, or tell the camper not to repeat something that is a secret.
- Swear or make inappropriate sexual, racial, or ethnic comments.

- Invite campers to visit the adult's social networking profile or become a "friend" on a social network.
- Tell inappropriate jokes.
- Date or engage in consensual relationships with campers.

Employees who are in charge of campers on a daily basis are bound absolutely by school policies regarding the care, supervision, safety, health, and moral well-being of those in their charge. Enforcement of stated policies is an unalterable obligation, for legal as well as professional reasons. Any violation of the welfare of supervised children can lead to the immediate dismissal of the employee. This stipulation includes all on-campus and off-campus occasions, formal or informal, where an employee is discharging his or her duties.

Pointers for Working with Campers

- Be patient and flexible.
- Busy kids are often happier than kids with little to do.
- Be sincere and find positive ways to reinforce program rules and safety guidelines. When in doubt refer corrigion behaviour difficulties to the Director
- in doubt, refer serious behavioral difficulties to the Director.
- Avoid showing favoritism among campers.
- Teach and model how playground and outdoor games can be inclusive, fair and fun. NEVER leave children unattended.

Cell Phones

Please leave your cell phone at home, in your car, or in the camp office. If you need to make a call, arrange for another counselor to watch your kids, and make your call in a private location. Cell phone use while working with kids during the work day is unacceptable. Personal messages will be taken in the camp office and delivered to you.

Checking In and Out of Work

Your daily routine must include clock in the time clock each morning and punching out at the end of the day.

Forgetting to punch in and out may cause errors in the calculation of your pay. Remember to clock in and out every day. Do not punch in or out for other employees.

Clothing

Clothing should be clean, professional, neat, comfortable and appropriate. Do not wear apparel that promotes alcohol or smoking or licentious behavior. All counselors and campers must wear shoes when outside the pool area.

Confidentiality

All employees are expected to show the highest regard for the privacy of each camper and the school, and must strictly observe the confidentiality of records and other information associated with campers and the school. Employees are required to respect and maintain the confidentiality of all information, including but not limited to, school records, camper records, camper photographs, correspondence and communications to which the employee has access in carrying out responsibilities and duties both during and after employment with Colorado Academy. None of the aforementioned may be copied, sent electronically, or removed from school premises.

All employees will be careful to discuss confidential information only when necessary and appropriate in the context of camp operations. Care should be taken to prevent confidential discussions from being overheard by campers, parents, or co-workers who are not involved (i.e. discussing problems in the dining hall or drop-off/pick-up areas).

Conflict of Interest

Summer Program employees must not engage in any activity that could constitute, contribute to or suggest a conflict of interest. A conflict of interest can be broadly defined as a situation that raises a question about the objectiveness of an employee's judgment and decision-making with respect to the work of the Colorado Academy Summer Programs. Employees have a responsibility to act in accordance with the highest standards of honesty and integrity.

A conflict of interest occurs when an employee's interest in, association with, or receipt of gifts from a camper or a parent is such that the employee's ability or willingness to act in the best interest of Colorado Academy can be questioned. It is the Academy's policy to treat all individuals and entities with whom we do business fairly and impartially.

In general, the use of good judgment, based on high ethical principles, will guide you with respect to lines of acceptable conduct. Employees are in general prohibited from accepting personal gifts (including tickets to entertainment events), favors, or services from campers, parents, or vendors. If an employee has a question about whether a situation is a conflict of interest, he or she should discuss the matter with the Director, and if necessary, with the Human Resource/Payroll Manager for guidance.

Other activities by employees that can compromise Colorado Academy's ability to fulfil the school's mission and best teaching practices also present potential conflicts of interest. This caution can apply to actions or statements on or off campus. Examples include writing or speaking about Colorado Academy in ways that associate the school with the views expressed [especially through the public media], can damage the reputation of the Academy. Please consult with the Director for clarification and counsel.

Driving School Vehicles

If you drive for the Camp Program, you are required to have a valid driver's license and an acceptable driving record. Motor vehicle records will be checked annually for all employees authorized to drive a school vehicle to ensure acceptability. Employees will not be authorized to drive school vehicles if their driving record includes:

1. Driving while intoxicated or impaired or under the influence of drugs within the last 5 years 2. Reck-

- less driving or careless driving conviction within the last 5 years
- 3. Speeding in excess of 25 MPH over the speed limit
- 4. High frequency of traffic violations

If you drive your own vehicle on program business, you are required to have in place current insurance coverage with at least the minimum dollar amount and types of coverage required by the State of Colorado. When an employee uses his or her personal automobile for program business, the employee's auto insurance provides the primary coverage, should an accident occur. This is true for both liability and property damage that is the result of an auto accident. The Academy provides auto insurance coverage to employees only when operating school-owned vehicles.

Employees have the responsibility to drive safely, obeying all state and local traffic laws. Tickets for traffic violations and illegal parking are the personal responsibility of the driver and should be resolved immediately. Cellular phone use is not allowed when driving any school vehicle.

Any accident/incident in which a school vehicle is involved or which occurred while on school business must be reported immediately to the Transportation Department.

Drug-Free Campus Policy

The following conduct is prohibited and violation may result in disciplinary action, including termination:

- The use, sale, purchase, manufacture, possession, transfer, or receipt of unlawful drugs, or being under the influence of unlawful drugs or alcohol, during working time or at any time while on Academy property or in a camp vehicle, is absolutely prohibited. Unlawful drugs confiscated from an employee may be given to the appropriate law enforcement agency and may result in criminal prosecution.
- Subject to the policy on compliance with the Americans With Disabilities Act, the use, or being under the influence, of any legal drug by any employee during working time or at any time on Academy property, including camp vehicles, is prohibited if such use or influence may detrimentally affect or impair the safety of co-workers or campers or the employee's job performance. Employees should obtain information from their physician regarding any potential impairment which may be caused by such medication. When impairment potential exists, employees must inform the Director.
- Employees must notify the Director within five (5) days of their conviction, plea of "no contest," or imposition of a sentence for a violation of any federal, state, or local criminal statute involving the manufacture, distribution, dispensation, use, or possession of any controlled substance.

Immunization Records and Health Information

In accordance with our accreditation with the American Camp Association and licensing requirements, all Summer Program employees must provide a copy of their most recent immunization record and a health information acknowledgement. A TB test is not required.

Inappropriate Items

Counselors are not allowed to have items at camp that pose risks or will disrupt some aspect of the camp day. Such items include, but are not limited to: skateboards, roller blades, knives, firecrackers, matches, lighters, slingshots, water pistols, pagers, alcohol, drugs, personal sports equipment, animals, electronic games, vehicles.

Injuries, On the Job

An employee who is injured while on the job must report that injury immediately to their supervisor. Additionally, the employee and/or the Executive Director must report the injury to the Business Office within 24 hours of the occurrence of the injury. Colorado state law requires timely filing of reports when employees sustain injury in connection with their employment. Failure to file the required report subjects the Academy to penalties and can result in the denial of benefits to the employee.

If treatment of the injury is needed employees should visit one of the following designated medical providers:

- Rocky Mountain Medical Group Englewood located at 730 W. Hampden Avenue, Suite 200, Englewood, CO 80110, Phone: (303)407-9316
- SCL Physicians Green Mountain located at 12790 W. Alameda Parkway, Suite A, Lakewood, CO 80215 (west of Union St on Alameda Parkway) Phone: (303) 403-6350.
- Concentra Medical Centers Lakewood located at 11185 W. 6th Ave, Lakewood, CO 80127. Phone: (303) 239-6060.
- On The Mend Occupational Medicine PLLC 3900 S. Wadsworth Blvd., Suite 325, Lakewood, CO 80235. Phone: (303) 634-2970. This facility is open from 8:00 a.m. to 5:00 p.m. Monday through Friday.

Employees who sustain serious injuries may go immediately (or be transported by ambulance) to the closest emergency room. The closest emergency rooms to campus are the Swedish Medical Center at 501 East Hampden Avenue, Englewood or the Swedish Medical Center Southwest at 6169 S. Ammons Way, Littleton. If an employee is not able to operate his or her own vehicle, transportation will be arranged. If you go first to an emergency room for treatment, you will be referred to one of the designated clinics listed above for follow up care.

Remember, your regular health insurance plan may not cover on-the-job injuries. Please ensure your entitlement to benefits and assist us to meet our obligations by notifying the Business Office immediately whenever you are injured in connection with your employment at CA. Your awareness of and concerns for safety continue to be important to all of us and are sincerely appreciated.

Lunch

All counselors are expected to eat lunch with campers and are compensated for this time. Please be sure that tables and outdoor spaces are cleaned and that campers eat in a mannerly way. All campers are involved in cleanup. Eating lunch off campus is not permitted.

Misconduct

Occasionally performance or conduct falls short of our standards and/or expectations. When this occurs, the Academy takes action which, in its opinion, seems appropriate. Disciplinary actions can range from a formal discussion with the employee about the matter to immediate discharge. Action taken by the Academy in an individual case should not be assumed to establish a precedent in other circumstances. The following conduct described below is not tolerated. These examples are not meant to be an all-inclusive listing, but merely illustrative. Any violation of these policies or any conduct considered inappropriate or unsatisfactory may, at the Director's discretion, subject the employee to disciplinary action up to and including termination.

- Theft of Colorado Academy property, the property of fellow employees, campers or other third parties; unauthorized possession or removal of any Colorado Academy property from the premises without prior permission from the school; unauthorized use of Academy equipment or property for personal reasons; using Academy equipment for personal profit.
- Engaging in an act of sabotage; willfully or with negligence causing the destruction or damage of Academy property, or the property of fellow employees, campers, suppliers, visitors or others.
- Engaging in criminal conduct or acts of violence, or making threats of violence toward anyone;
- Fighting, or horseplay or provoking a fight.
- Threatening, intimidating or coercing fellow employees on or off the premises at any time, for any purpose.
- The possession of firearms or other weapons on Academy property or while working.
- Reckless conduct, unsafe practices, and unsafe performance of any job.
- Reporting to work under the influence of alcoholic beverages and/or illegal drugs or the use, sale, dispensing, or possession of alcoholic beverages and/or illegal drugs in violation of Academy policy.
- Insubordination or refusing to obey instructions, properly issued by camp administrators, pertaining to an employee's work.
- Dishonesty or the falsification of timekeeping records, employment application, or any information requested for legitimate business reasons including but not limited to, lying about sick leave or falsifying a reason for a leave of absence.
- Harassment of any kind see Equal Employment Opportunity and Nondiscrimination section.

Parking

Staff should park along the north road.

Pay Day

Pay day for all employees is the last business day of the month. The monthly pay period begins on the 22nd of the month and ends of the 21st of the month. The August paycheck will be mailed to you at the current address on file unless you make alternative arrangements.

Personnel Records

By law, Colorado Academy is required to obtain certain personal information and maintain up-to-date files regarding each employee. Personnel files are kept safe and confidential and access to them is restricted to Business Office staff. Please notify the Camp Office if there is a status change concerning your phone number, email address, address, personal physician, or person to be contacted in an emergency.

You must complete an Internal Revenue Service form I-9 and W-4 before you begin working at Colorado Academy. If you have worked at Colorado Academy in previous summers, your I-9 form is already on file.

Performance Evaluation

In an effort to help the staff member perform his or her duties at an optimum level, each staff member is evaluated on a regular basis through verbal conversations and written evaluation forms that will be reviewed and signed by both the employee and his or her supervisor.

Photographs

Staff is never allowed to share, modify, post, or send photographs of campers. Photographs taken at camp are the property of camp and only to be used by the camp.

Physical Hazards on Campus

Extra caution and heightened supervision should be used around Woody's pond, the swimming pool, and parking areas.

Resolving Disputes

Every employee may appeal the actions of those who have immediate authority over him or her. Employees have the following communication channels available to them:

- 1. If you have a problem, discuss it with your supervisor. You will find that a frank talk with your supervisor is usually the easiest way to deal with the problem.
- 2. If the matter is not resolved, or if it is of such a nature that you prefer not to discuss it with your immediate supervisor, you should go to the Summer Programs Director.
- 3. Finally, if you feel that you still have not received a satisfactory answer, you may direct the matter to the Colorado Academy Human Resource/Payroll Manager or to the Business Manager/CFO.

Right to Access

Colorado Academy has the right, at its discretion, at any time to access:

- 1. Desks, closets, files, offices, workstations, and any other property of the Academy.
- 2. Any information which is stored electronically in the Academy's equipment, computer systems, or off-site cloud locations.

Security Identification

All Day Camp employees must wear their staff ID badge to identify themselves as members of the Day Camp staff.

Technology Use

The purpose of the Colorado Academy technology resources and network is to support the educational mission of the School. The use of such resources should be limited to those activities that support the School's educational objectives.

This policy outlines acceptable use policies for technology resources including key principles with regard to technology use and expectations of privacy. This policy is designed to maintain the safety and security of the school and all of its employees, campers, and community members.

A. General Use

Faculty and staff may not use electronic devices in any way that is a violation of the law, harassing, or disruptive to the educational environment, including accessing, publishing, displaying, or printing any obscene, threatening, offensive, inappropriate, or illegal material.

Accessing the accounts, files, or communications of others without appropriate authorization is prohibited. The School reserves the right to monitor network usage and to limit or block access for any user who uses excessive amounts of network resources of bandwidth. Attempting to impair the network or to bypass restrictions set by the technology department, circumvent any security or filters, obtaining another user's password or rights to another user's directory, files, or e-mail is a violation of School rules and in many cases is also a violation of the law.

B. Privacy and Monitoring

The School reserves the right to inspect all electronic data and usage occurring over the School's network or on School property without prior notice. This includes individual computers, iPads, email accounts, local files, and cloud storage.

Employees should not assume that any messages or materials on his/her device or the School's systems are private or that deleted messages, data, or information are necessarily removed.

C. Accounts and Passwords

Some employees may be provided a login to access the Colorado Academy's network, email, and other technology resources. Employees should guard their password and treat it as private information. Employees are responsible for any activity done on the School's system using their login information. If for any reason an employee believes that their school account has been compromised or improperly accessed they should contact the technology department immediately.

D. Data and Device Security

No protected information should be stored on school or personal devices. Email is not a secure or confidential medium so no protected information should not be transmitted through email.

Protected information includes:

- Social security numbers
- Bank accounts
- Credit/debit cards
- Driver's license number
- Passwords

Do not store personal (non-work related) pictures, videos, music, and files on school devices. The school does not provide any data backup for individual desktops, laptops, or iPads.

Personal devices such as mobile phones, iPads, and computers that are used to access school resources (e.g. email or grades) should be protected by a password, passcode, fingerprint, or some other security mechanism.

E. Digital Communication

Please keep in mind that everything you send using your email account or write or depict on a blog, Twitter account, or social networking site is a reflection of yourself as a professional and as a representative of the School. Please consider this carefully when reviewing the content of your messages or postings to Internet sites.

Employees, with limited exceptions, are not permitted to communicate with parents or campers using email or text messaging. Personal email should never be used for program communication.

F. Phishing, Viruses, Malware, Spam and Attachments

Computers and accounts are often compromised through phishing attacks (fake email), web sites, or software downloaded from web sites. Please be careful when clicking on any links in email or downloading programs from the Internet.

G. Software Licensing

Employees are not permitted to install software on school computers or other devices. Employees with questions regarding this policy should contact the Director.

H. Social Network Use

1. Personal Online Activities. The Academy respects the rights of campers, faculty, and staff to engage in free and open communication of their personal information through the individual use of weblogs, internet diaries, social websites like Facebook, Twitter, LinkedIn, Vimeo, Instagram, and other forms of online discourse ("Personal Online Activities"). Campers, faculty, and staff should be mindful of privacy settings. Because each and every student, faculty, and staff member represents the school, content posted to personal Facebook/Twitter/Instagram accounts should be in good taste. Personal photos,

especially, should be filtered for appropriateness. Unless privacy settings are manually changed, each and every person should assume that his or her personal information could be accessed by anyone on the Internet.

Also, please remember that once content is posted online, it may be redistributed through the Web or other media channels. Older versions or information may continue to exist even if the content is deleted or modified.

The content of Personal Online Activities may not contain:

- a. Any reference to confidential or privileged information or activities of campers or their families, whether by name or implication;
- b. Any reference to a camper including names, photos and videos;
- c. Any reference to campers, faculty, staff, or Colorado Academy administrators or trustees whether by name or implication, that would in any manner defame such individual;
- d. Any reference to confidential or privileged information or activities of faculty, staff, administrators, or trustees;
- e. Any material that in the sole discretion of the Colorado Academy is considered obscene, defamatory, threatening, harassing, illegal, or abusive to any person or entity associated with Colorado Academy;
- f. Any material that is profane, pornographic, obscene, indecent, lewd, vulgar or sexually

offensive language, pictures or graphics or other communication that could reasonably be anticipated to cause a substantial disruption to the school environment; g. The Colorado Academy logo, Horizons logo or other copyrighted material of Colorado Academy without express, written consent from the Academy; h. Internet postings which libel or defame the Colorado Academy Board, individual Board members, campers or other school employees;

i. Content which intends to harass, bully or intimidate employees or campers. j. Campers, faculty, staff, and administrators may not create fake accounts or profiles that use another's name, likeness or other personal details. Campers, faculty, staff, and administrators also may not share false or misleading information about other individuals on social media.

- **2. Friending.** Do not initiate or accept social network friend requests with current campers or former campers under the age of 18, nor with any program parents. Use professional discretion when friending former campers 18 or over. Understand that the unequal power dynamics of the school, in which adults have implied authority over former campers, continues to shape those relationships.
- **3. Other Friends.** Remind all other members in your network of your position as an educator whose profile may be accessed by current or former campers, and to monitor their posts to your site accordingly. Conversely, be judicious in your postings to all friend sites and act immediately to remove any material from your site that may be inappropriate, and ask others to remove inappropriate material which may involve you from their sites.
- **4. Groups in Your Social Network.** Associate with social networking groups consistent with healthy, pro-social activities and the mission and reputation of the School, acting with sensitivity within the context of a diverse educational environment in which both campers and adults practice tolerance and accept competing views.
- **5. Privacy Settings and Content.** Exercise care with privacy settings and profile content. Content should be placed thoughtfully and periodically reviewed. In addition, know that privacy settings can be changed at any time to limit access to profiles and searchability to content, and that changes should be made accordingly.
- **6.** Public Information. Recognize that many former campers have online connections with current campers, and that information shared between school adults and former campers is likely to be seen by current campers as well.
- **7. Time on Social Sites.** Understand that you should not be on a social networking site for personal use during work hours. Please limit this activity to your off hours.
- **8. Off-duty Use.** This Social Network Use policy does not prohibit lawfully protected communications regarding an employee's off-duty political, recreational, or other legally protected activities.

I. Policy Violations

Consequences for violations of this policy include but are not limited to:

- disciplinary action, including dismissal from employment; and
- referral to law enforcement, legal action and prosecution by the authorities.

J. Disclaimer

Colorado Academy's computer technology, network and internet system is to be used for educational and professional purposes. There is no assurance of privacy or warranty of any kind, either expressed or implied, or that all services provided through this system will be error-free or without defect. CA does not guarantee the functioning of any computer, iPad, server, or the network, and it is not liable for any service interruptions or inconvenience, including lost data sustained in the use of any computer, iPad or other hardware or software. Colorado Academy specifically denies any responsibility for the accuracy or quality of information obtained through the Internet.

Termination of Employment

A. "At Will" Employer

Employment with the Summer Programs at Colorado Academy is at the mutual consent of the Academy and the employee, and either party may terminate that relationship at any time, with or without cause, and with or without advance notice, except as otherwise provided by law. This is commonly referred to as an "at will" employment arrangement.

B. Resignation

Resignations are considered to be voluntary by employees. Although employees are "at will" and may terminate their employment at any time, with or without notice, employees who decide to resign are requested to notify their supervisor and to submit a letter of resignation. The letter should contain the reason for resignation and the date the employee plans to leave.

C. Pay at Termination

In the event of a voluntary termination, the employee will be paid on the next regular payday for all hours worked but not yet compensated. In the event of an involuntary termination, the employee will be paid immediately for all hours worked but not yet compensated. However, if the termination occurs after 4:00 pm, the final paycheck will be available by 11:00 am on the next regular workday.

D. The Employee's Responsibilities

An employee whose employment with the Academy is terminated for any reason must return all school property. Records, files, documents, correspondence, and other Academy property may not be removed from the premises. Employees leaving the Academy may not copy or use in any form Academy records, files, documents, correspondence, computer disks, or other property of the Academy.

Tobacco

For the health and comfort of employees and campers, the Academy has a smoke-free workplace policy. This means that smoking is not permitted inside any facility of the Academy.

Whistle Blower Policy

The purpose of this policy is to establish a procedure for employees to report illegal or dishonest activity or other misconduct involving the School's financial or business affairs.

Such activity may involve another employee or outside persons or firms doing business with the school. Examples of illegal or dishonest activities are violations of federal, state or local laws, billing for services not performed, fraudulent financial reporting or other misconduct involving the School's financial or business affairs.

A. Employee Reporting Process

If an employee has knowledge of or concern of such illegal or dishonest activity or misconduct, the employee should communicate with any of the following:

- Summer Programs Director (Ext. 2531)
- Business Manager/CFO (Ext. 2524)
- Human Resource/Payroll Manager (Ext. 2523)

Any violation involving the Director should be reported directly to the Business Manager. Any violation involving the Business Manager should be reported directly to the Head of School. Any violation involving the Head of School should be reported to either the Business Manager or the Chair of the Board of Trustees.

Communications may be verbal or written. No particular format is necessary. However, all communications should include as much information as possible to permit a thorough and complete evaluation of a complaint or charge. This includes material evidence, names or persons able to corroborate the accusations, if possible, and how to contact the complainant to assure anonymity, if anonymity is desired. The recipient of such complaint is responsible for ensuring that all information regarding the complaint is properly recorded and thus becomes the formal

record of the complaint. A copy of the written complaint will be provided to the complainant for confirmation of accuracy.

All complaints received under this policy will be promptly investigated. A person who believes that their report of illegal or dishonest activities or other misconduct involving the School's business or financial affairs is not receiving appropriate attention may contact the Chair of the Board of Trustees.

B. Employee Responsibility and Protection

An employee (whistleblower) who makes a complaint or charge must exercise sound judgment and act without malice to avoid baseless allegations or frivolous complaints. The whistleblower is not responsible for investigating the activity or for determining fault or corrective measures.

Colorado Academy will protect whistleblowers against adverse action in the form of retaliation. This includes, but is not limited to, protection from employment action such as termination, compensation decreases, poor work assignments and threats of physical harm. Any whistleblower who believes they are being retaliated against should contact the Business Manager. In the case of perceived retaliation by the Business Manager, a whistleblower should contact the Head of School, or, in the case of perceived retaliation by the Head of School, the Chair of the Board of Trustees.

Insofar as is reasonably possible, the confidentiality of the whistleblower will be maintained. However, the whistleblower's identity may have to be disclosed to conduct a thorough investigation or to comply with applicable laws.

Any employee, however, who knowingly files a false or materially misleading report of illegal or dishonest activities or other misconduct involving the School's business or financial affairs, is subject to disciplinary action.

C. Questions

Employees with questions regarding this policy should contact the Director or Human Resources/Payroll Manager.