

Policy Type: Operational Policy

Title: Mandatory Training and Civil Rights Policy

Status: Effective

Effective: October 21, 2026

I. Purpose and Scope

Custom Class Charter School (“Custom Class” or the “School”) requires employees to understand their responsibilities for student safety, civil rights, professional conduct, and school operations. This policy establishes mandatory training, documentation, and civil-rights reporting expectations for online, hybrid, community-based, and in-person work.

All employees, including the Executive Director, shall complete assigned training. Contractors and volunteers shall complete training applicable to their assignments before receiving access or responsibilities that require it. Applying conduct and training standards does not determine a person’s employment classification.

II. Mandatory Training

A. Training Plan and Required Resources

The Executive Director or designee shall maintain an annual training plan using the Custom Class Required Trainings Resource Guide, the Employee Handbook, current Board policies, and applicable legal requirements. The plan shall identify each course, covered roles, completion deadline, renewal interval, required assessment, and evidence of completion. Administration may update resources without reducing Board-adopted or legally required standards.

Required topics shall include professional boundaries and the Employee Code of Conduct; child-abuse and neglect reporting; bullying, hazing, abusive conduct, and retaliation prevention; workplace harassment and civil rights, including Title VII; recognition and reporting of student sexual harassment and Title IX concerns; student and employee data privacy; acceptable technology use; emergency preparedness and injury reporting; and review of the Employee Handbook and policies applicable to the employee’s work.

Employees shall also complete the foundational behavior-support training identified as required for all staff in the Resource Guide. Administration shall assign the guide’s suicide prevention, human-trafficking awareness, medical-emergency awareness, emergency safety intervention, and defensive-driving resources according to applicable requirements and duties. Required

medical awareness includes the guide's diabetes, naloxone, inhaler, AED, and anaphylaxis resources; seizure-response training and competency verification shall be assigned when applicable. Awareness training alone does not authorize medication administration, restraint, seclusion, clinical treatment, or other duties requiring separate qualification or approval.

B. Completion and Renewal

New employees shall receive Employee Code of Conduct training and acknowledge understanding within 10 days of beginning employment, consistent with that policy. Required safety orientation shall occur before independent student supervision or access to confidential information. Other initial training shall be completed by the deadlines in the written training plan and before any duty requiring prior qualification.

Each school year, employees shall review and acknowledge the current handbook, Code of Conduct, civil-rights reporting instructions, and assigned training plan. Civil-rights and harassment reporting refresher training shall occur annually. Other courses shall be renewed at the intervals required by law, Board policy, or the written plan. Administration shall provide accessible training and reasonable arrangements for employees who need assistance completing it.

C. Completion Evidence and Oversight

Employees shall submit the School's Training Completion Certification Form and requested certificates or assessment results. Administration shall maintain a register identifying each participant, role, course and version, completion date, evidence, and next due date. An acknowledgment without completion does not satisfy a required course. Records shall be retained under applicable retention requirements and made available for authorized reviews.

Supervisors shall follow up on overdue training and restrict duties when required qualifications are incomplete. Failure to complete assigned training may result in corrective action consistent with the handbook and applicable agreements. The Executive Director shall report overall completion and unresolved deficiencies to the Board at least annually.

III. Civil Rights and Equal Opportunity

Custom Class prohibits unlawful discrimination, harassment, and retaliation in employment, admissions, educational services, discipline, and school-sponsored activities. Consistent with the Employee Handbook and Code of Conduct, the School prohibits discrimination based on race, color, national origin, religion, sex, pregnancy, sexual orientation, gender identity, disability, age, veteran status, or another characteristic protected by applicable law. Applicable legal protections govern their respective employment and educational contexts.

Training shall distinguish Title VII employment protections from Title VI protections concerning race, color, and national origin in federally assisted programs; Title IX protections against sex

discrimination in education; and disability protections under Section 504 and the Americans with Disabilities Act. Training shall address reasonable accommodations, prohibited harassment, reporting options, and retaliation. Employees need not decide which law applies before reporting a concern.

The Executive Director shall designate qualified Title IX and Section 504 coordinators and publish current names, titles, telephone numbers, email addresses, and office or mailing addresses with the School's nondiscrimination notice. A current reporting-contact directory shall also identify a direct Board Chair contact and an alternate Board contact for conflicts of interest.

IV. Reporting and Response

A. Reporting Channels

An employee who experiences or witnesses suspected discrimination, harassment, or retaliation shall report it promptly to the Executive Director, an appropriate supervisor, the designated coordinator, or the Board Chair. Reports may be oral or written; assistance shall be available to document an oral report. Anonymous reports shall be considered to the extent the available information permits a response.

A person may bypass anyone involved in the allegation. A complaint involving the Executive Director may go directly to the Board Chair; a complaint involving the Chair may go to the Vice Chair or another uninvolved Board officer. No person is required to confront the alleged offender, attempt informal resolution, or follow the general grievance chain before reporting. Employees receiving a report shall promptly route it to the appropriate coordinator or an uninvolved administrator.

B. Fair Response and Protection

The responsible administrator or coordinator shall promptly assess safety and support needs, preserve relevant records, and arrange a fair, impartial response under the procedure applicable to the complaint. An implicated individual shall not control the investigation or decision. Information shall be shared only as needed for an appropriate response and as required by law; absolute confidentiality cannot be promised.

The School prohibits retaliation for reporting concerns, seeking an accommodation, or participating in an investigation or protected process. An allegation that is not substantiated does not, by itself, establish a false report. Corrective action shall follow applicable procedures, the handbook, and other governing policies. Internal reporting does not restrict access to the EEOC, Utah Antidiscrimination and Labor Division, U.S. Department of Education Office for Civil Rights, law enforcement, or other lawful remedies, and does not extend external filing deadlines.

C. Title IX and Other Specialized Procedures

Reports of possible Title IX sexual harassment shall be referred promptly to the Title IX Coordinator for supportive measures and handling under the School's published, legally compliant Title IX grievance procedures. The Executive Director shall ensure that those procedures are maintained and available, including complaint intake, impartial investigation, decision-making, and appeal safeguards. This policy establishes training and reporting duties; it does not replace the required Title IX grievance procedures or special education and Section 504 processes.

Before serving, Title IX coordinators, investigators, decision-makers, and informal-resolution facilitators shall complete role-specific training required by the governing Title IX regulations, including impartiality, conflicts of interest, and the applicable complaint process. General staff awareness training alone does not qualify a person for those roles. Required training materials and records shall be published or retained as applicable law requires.

Suspected child abuse or neglect shall be reported immediately as required by the Child Abuse-Neglect Reporting Policy and law. Internal reporting, a civil-rights investigation, or completion of a school form shall not delay a required report to DCFS or law enforcement.

V. Related Policies and Administration

This policy supplements the Employee Code of Conduct and Professional Boundaries Policy; Employee Handbook; Bullying, Cyber-Bullying, Hazing, Retaliation, and Abusive Conduct Policy; Child Abuse-Neglect Reporting Policy; Administrative Data Governance Plan and Student Data Privacy Policy; Acceptable Use and Electronic Device Use Policy; and Professional Standards and Training for Non-licensed Employees and Volunteers Policy. The general Grievance Policy and Procedure does not replace the specialized reporting channels described here.

Administration shall review implementation annually and recommend Board revisions when needed. Controlling law and applicable specialized procedures govern any conflict. This policy does not alter employment status or create a promise of continued employment.

Certification

Upon approval, the undersigned officers of Custom Class Charter School certify that this policy was duly adopted by the Governing Board on the date recorded below.

Signature: _____  _____

Matthew J. Middione — Board Chair

Signature: _____  _____

Douglas Reed — Board Vice Chair

Adopted / Effective Date: October 21, 2026

Revised Date: _____

References

Custom Class Board Policies and Agreements

Custom Class Required Trainings Resource Guide

Custom Class Employee Code of Conduct and Professional Boundaries Policy

Custom Class Employee Handbook

Legal references: Title VI and Title VII of the Civil Rights Act; Title IX; Section 504; ADA. EEOC harassment guidance

U.S. Department of Education — current Title IX regulations