

PROVIDENCE HIGH SCHOOL

Code of Conduct

Last Revised January 2025

Contents

1.1 Mission, Vision, Promise, Values	6
1.1.1 Mission	6
1.1.2 Vision	6
1.1.2.1 Outcomes.....	6
1.1.2.2 Commitments.....	6
1.1.3 Promise	6
1.1.4 Values	6
Compassion	6
Dignity	6
Justice	6
Excellence	7
Integrity	7
1. Academic Accreditations and Affiliations	8
1.2.1 All Providence High School.....	8
Accreditations	8
Affiliations	8
2. Campus Community.....	8
2.1 Code of Conduct.....	8
2.1.1 Introduction	8
2.1.2 Integrity and Compliance.....	9
2.1.3 Faculty and Staff Standards	12
2.1.4 Legal and Regulatory Compliance	15
2.1.5 Workplace Environment Standards	18
2.1.6 Business and Financial Information.....	22
2.1.7 For More Information.....	26

1.1 Mission, Vision, Promise, Values

1.1.1 Mission

As expressions of God's healing love, witnessed through the ministry of Jesus, we are steadfast in serving all, especially those who are poor and vulnerable.

1.1.2 Vision

As people of Providence, we practice joy, challenge ourselves intellectually, and commit to faithful service by valuing everyone as individuals within the healthiest possible learning community.

1.1.2.1 Outcomes

By realizing this vision, students, faculty, and staff are provided opportunities to explore their curiosities, cultivate their strengths, and use their voices in service to each other and the world.

1.1.2.2 Commitments

Providence will foster an educational program that prioritizes student health and relationships to develop graduates who know themselves and are intellectually and emotionally capable of championing causes that are relevant to them and the world they inhabit.

1.1.3 Promise

Know me; Care for me; Easy my way.

1.1.4 Values

Compassion

Jesus taught and healed with compassion for all. – Matthew 4:24

We reach out to those in need and offer comfort as Jesus did. We nurture the spiritual, emotional, and physical well-being of one another and those we serve. Through our healing presence, we accompany those who suffer.

Dignity

All people have been created in the image of God. – Genesis 1:27

We value, encourage, and celebrate the gifts in one another. We respect the inherent dignity and worth of every individual. We recognize each interaction as a sacred encounter.

Justice

Act with justice, love with kindness and walk humbly with your God. – Micah 6:8

We foster a culture that promotes unity and reconciliation. We strive to care wisely for our people, resources, and our earth. We stand in solidarity with the most vulnerable, working to remove the causes of oppression and promoting justice for all.

Excellence

Whatever you do, work at it with all your heart. – Colossians 3:23

We set the highest standards for ourselves and our ministries. Through transformation and innovation, we strive to improve the health and quality of life in our communities. We commit to compassionate, safe, and reliable practices for the care of all.

Integrity

Let us love not merely with words or speech but with actions in truth. – 1 John 3:18

We hold ourselves accountable to do the right things for the right reasons. We speak the truth with courage and respect. We pursue authenticity with humility and simplicity.

1. Academic Accreditations and Affiliations

1.2.1 All Providence High School

Accreditations

California Association of Independent Schools

Accrediting Commission for Schools Western Association of Schools and Colleges

Western Catholic Educational Association

Affiliations

National Association of Independent Schools

California Independent Schools Business Officers Association

California Teacher Development Collaborative

Southern California People of Color in Independent Schools

The Independent School Alliance

Association for Supervision and Curriculum Development

2. Campus Community

2.1 Code of Conduct

2.1.1 Introduction

Why we have a code of conduct.

At Providence High School we are committed to “doing the right thing right” and conducting ourselves with the utmost integrity. The success of the School and the continuing heritage of the Sisters depend on us building honest and trusting relationships with our fellow employees, students, parents, School-related business partners, regulators, and the communities we serve. To achieve our mission, vision, and values, we commit to conducting all business activities in an honest, fair, and ethical manner.

In today’s operating environment, the rules that govern School practices are more demanding than ever before and require us to keep integrity at the core of all we do in advancing our Mission, vision, and values. It requires a commitment from each of us to conduct our business honestly and ethically, regardless of the situation.

Our mission, vision and values provide guidance and inspiration as we make sound, ethical choices to deliver quality education and services while meeting our organizational goals. The School's commitment to integrity is a vital part of who we are as a Catholic education ministry.

The Code of Conduct provides us with a set of standards that guides our decision-making and our commitment to “doing the right thing right.” This means conducting our business within

appropriate ethical, legal, and regulatory standards and complying with the School's policies and standards.

In addition to the Code of Conduct, there are institutional policies, procedures and standards that may apply to your work located in this Handbook.

How should I use the Code of Conduct?

The Providence High School Code of Conduct asks you to reflect on our mission, vision, and core values as you apply ethical and legal standards to your work. The Code of Conduct helps you answer these questions:

- Are my actions and decisions consistent with the School's mission, vision, and values?
- Am I supporting the spirit, as well as the letter, of laws, regulations, policies, or standards?
- Can I explain my actions or decisions without embarrassment to family, friends, coworkers, or students?
- Would my behavior harm the School's reputation in the community?
- Whom should I contact if I believe a violation has occurred?
- What do I do if retaliation occurs when I raise a concern?
- Whom should I contact with questions?
- How do I contact my local integrity, compliance, and privacy representative?

2.1.2 Integrity and Compliance

Our Commitment

The School is committed to acting with integrity in all we do. We require compliance with California and federal laws and regulations, this Code of Conduct and School policies and standards. Our Integrity and Compliance Program applies to employees, students, Board of Regents members, parents, members of our system, community volunteers, trainees, independent contractors, and others who may be on campus or participating in any events sanctioned/funded by our School.

The Audit and Compliance Committee of the Providence Health & Services (Providence) System Board provides oversight and direction for the Integrity and Compliance Program. Providence's Executive Vice President/Chief Risk Officer serves as the School's Chief Compliance Officer.

The School Compliance Office and Providence System Integrity are responsible for the day-to-day direction and implementation of the Integrity and Compliance Program. This includes developing resources (policies, procedures, education programs and communication tools) and providing support (managing the Providence Integrity Line and other reporting mechanisms, conducting program assessments, and providing advice) to ministry compliance representatives and others.

Our Human Resources employees are also highly knowledgeable about many of the employment and workplace compliance-risk areas described in this Code of Conduct. You are encouraged to report any concerns about your work situation to Human Resources. Integrity and compliance professionals work closely with Human Resources to investigate and resolve matters relating to employment and workplace situations.

Confidentiality of Reports

We make every attempt to protect the confidentiality of information provided in connection with a reported concern, to the extent allowed by law, unless maintaining confidentiality could create a significant health or safety risk or impair the ability to conduct a complete investigation.

Confidential Work Product and Media

School information, including information regarding the School's finances, enrollment, students, vendors, and programs, which has not been made public, is confidential. Employees may not release confidential information to anyone unless required for a business purpose of the School or by a legal process such as a subpoena or court order. Employees may not use confidential information for private interest or personal gain. No employee may remove School information, confidential or not, from the School's property without permission from the employee's supervisor, except in the ordinary course of performing duties on behalf of the School. These materials include, without limitation, documents, notes, files, records, computer files or similar materials. The School prohibits employees from attempting to obtain and from possessing confidential information for which they have not received explicit permission, access, or authorization. An employee who is unsure about the confidential nature of specific information or the employee's authority to access or use confidential information must ask their supervisor for clarification. Any employee who misappropriates for their own use or discloses trade secrets, confidential information or any other proprietary information to other persons or organizations without proper authorization will be subject to disciplinary action, up to and including termination, and legal action, even if they do not actually benefit from the disclosed information.

However, the terms and conditions of an employee's own employment, including their pay and benefits, is not considered confidential information under this policy, and may be disclosed by the employee or not, as the employee prefers. However, the School will keep employee personnel information confidential, and will not release such information or documents to third parties unless there is reasonable protection of the employee's privacy, the employee has given his/her written authorization, providing the information is required by legal process, and/or release of the information is needed to protect the School's interests.

The School retains legal ownership of the work product of its employees. All work product created by employees in connection with their work for the School or using School property is considered work-for-hire and is the property of the School. The work product includes, but is not limited to, written and electronic documents, audio and video recordings, system code, and all intellectual property developed for the School, regardless of whether the work product is used by the School.

Retaliation Will Not Be Tolerated

Providence prohibits any retaliation against any School employee or workforce member for reporting a concern in good faith or assisting in the investigation of a concern. Anyone who engages in retaliation against any person who has raised a concern or is believed to have done so is subject to disciplinary action in accordance with the School's policy (expulsion for students or termination for employees).

If you believe that retaliation or harassment is occurring, report it to Human Resources, our compliance representative or to the Providence Integrity Line at 888-294-8455.

Corrective Action

Where an internal investigation substantiates a reported violation, the School will initiate corrective action. Corrective action may include notifying the appropriate government agencies, taking disciplinary action and/or implementing other corrective actions to prevent a similar violation from occurring in the future.

Violation of the law, any School policy or procedure or School values is grounds for disciplinary action, which can include termination of employment.

Contact your supervisor or Human Resources if you have any questions concerning any School policy, practice, or condition of employment.

Employee Responsibilities

- Follow the Code of Conduct.
- Perform your job duties in accordance with all federal and state laws or regulations that apply.
- Participate in Integrity and Compliance Program training and job-specific compliance education or departmental training as necessary for your job duties.
- Report all concerns or perceived violations promptly.
- Keep confidential information obtained confidential.
- Whenever you are in doubt about something, ask questions.

Leadership Responsibilities

- Support the School's commitment by upholding our Mission, vision, and core values.
- Model ethical behavior and foster a culture of transparency by listening and being receptive to employees' and others' concerns about integrity and compliance-related matters.
- Ensure that written compliance policies and procedures specific to your department are developed and followed.
- Provide employees with initial and continuing integrity and compliance education and document that education.
- Monitor and ensure compliance with the Code of Conduct, School policies and standards, and federal and state laws and regulations.
- Take appropriate corrective or disciplinary action to address misconduct and resolve matters when necessary.
- Prevent retaliation against any employee who reports, supplies information about or assists in an investigation into an integrity or compliance concern.

Reporting a Concern

Providence expects that integrity, compliance, or legal concerns will be reported promptly. Each School employee has a responsibility to report any activity that appears to violate laws, rules, regulations, standards, or this Code of Conduct. Employees should report any concerns they have, whether or not they involve a potential violation of law or School policy.

If you have a concern you believe poses a serious or immediate compliance risk that can significantly affect licensure, reimbursement, or accreditation, or may lead to a major legal claim, report these concerns either directly to the system integrity office or to your regional Compliance Office. Numbers are listed below. The safety of our students and employees is of

paramount importance to the School and any safety concerns you have should be reported using any of the following options.

All integrity, compliance and legal concerns can be reported using any of the options below (preferably in this order):

1. Discuss the matter or concern with your immediate supervisor.
2. Discuss with the School's Director of Human Resources.
3. Discuss the matter or concern with the Head of School or Assistant Head of School.
4. Contact the compliance or privacy representative directly.
5. Call the 24/7 Providence Integrity Line at 888-294-8455 or use Integrity Online, our web-based reporting option. You may report concerns anonymously.

If you have tried these options without success or you feel uncomfortable contacting these people, call the Providence Integrity Line or use Integrity Online. This policy does not require reporting to any of the individuals alleged to have engaged in or ratified the offending conduct.

Employees may make reports pursuant to this policy without fear of reprisal. All reports will be reviewed and addressed as appropriate. Reports or complaints of discrimination, harassment, or retaliation are to be reported, and will be investigated and addressed, as set forth in the Discrimination, Harassment/Sexual Harassment and Workplace Violence policy.

The Providence Integrity Line and Integrity Online are answered by a third-party company, which sends all reports to the Compliance Office for investigation. Reporters receive a tracking number in order to retrieve information about the status of their reports.

If you report a concern anonymously, it is important to clearly describe the situation, provide a ministry location and give enough detail so that your concern can be properly investigated and resolved. We may not be able to investigate your concern if you do not provide enough factual information.

2.1.3 Faculty and Staff Standards

We nurture the spiritual, physical, and emotional well-being of one another and those we serve.

Faculty Conduct

As members of the faculty of the School and part of the Catholic academic community created by the Sisters of Providence, we aspire to the highest standards of ethical behavior. We affirm the spirit of this Code is grounded in the Catholic ethic of love for all persons and in individual responsibility to God and people. The purpose of the Code is to encourage responsible actions, as well as sensitivity and mutual support among all members of the academic community.

Each of us strives to respect the dignity of others, to acknowledge the right of others to express differing opinions and to foster and defend intellectual honesty. Students are entitled to an atmosphere conducive to learning, to fair and just treatment in all situations and an attitude of support for each member of the academic community. Faculty members strive to be objective in professional judgment of colleagues and assist all members to reach their full potential as educators and members of the School community.

General Conduct

Employees must possess a personal philosophy compatible with, and desirous of contributing to, the Catholic School environment. Employees must behave in a manner that does not discredit the School. In all interactions with students, employees are mentors and representatives of the School and must conduct themselves appropriately. Employees must exhibit courteous, considerate, and professional behavior and language toward students, faculty, visitors, the public and other employees. Employees must behave with care and attention to the students' needs and the School's quality standards and requirements. Employees must work in an efficient, economical, and safe manner. Unsatisfactory work performance will result in disciplinary action and possible termination. Employees at all times must maintain professional standards of conduct appropriate to the School's business.

Failure to comply with the School conduct guidelines or any other guidelines, rules, regulations, policies, procedures, or practices of the School, whether in this Code of Conduct or not, may result, at the School's discretion, in disciplinary action being taken, including termination of employment.

Expected and Improper Behaviors

Our value of compassion leads us to nurture the spiritual, physical, and emotional well-being of those we serve. We apply this value to our work with each other and to the care and service we provide. In keeping with this core value, employees are expected to treat others with respect and courtesy and to conduct themselves in a professional manner. Expected behaviors that contribute to a positive work environment include:

- Speaking in a respectful manner to students, families, facility personnel and others in private and public places.
- Responding to requests for information in a timely and supportive manner, whether related to education delivery, collegial and professional interactions, or to students and families.
- Handling conflicts, disagreements, and other differences of opinion in appropriate settings and through appropriate administrative channels.
- Offering constructive feedback to improve student learning and operations; and
- Practicing in a manner consistent with federal and state laws and regulations.

Improper behavior is a style of interaction between employees, family members or others that detracts from campus life. Examples of improper behaviors may include, but are not limited to:

- Threatening or abusive comments.
- Profanity or similarly offensive language.
- Demeaning behavior such as name-calling.
- Criticizing other employees in front of students or other staff.
- Racial or ethnic jokes or comments.
- Inappropriate physical contact, sexual or otherwise.
- Sexual comments or innuendo.
- Refusal to reasonably cooperate with other employees or Leadership; and
- Refusal to abide by organizational policies, rules, and regulations or to perform student academic responsibilities.

Fraternization with Students

Employees may not offer to or request from School students sexual favors or intimacy. Additionally, employees may not make sexual advances or engage in sexual or romantic conduct with any School students, consensual or otherwise. School students include any alumni that an employee knew personally.

Fraternizing/socializing between faculty and students is not permitted as it may compromise the School as well as the student/teacher relationship. School personnel are expected to maintain their professionalism and act responsibly.

Psychological Harm

Employees must not behave in ways a reasonable person would consider to be offensive, intimidating, humiliating, or threatening. Such conduct might include, yet is not restricted to:

- Targeting students with unfair or continuous criticism.
- Making excessive or unreasonable demands of others; and making any form, either oral or written (including electronic communication), of derogatory comments to students, parents, work colleagues or the general public, other than constructive criticism of work product or School processes, or any reports, complaints, or communications regarding potential violations of law or School policy, or where reporting is otherwise authorized or protected.

Should such unacceptable behavior occur, then all recipients of such behavior have recourse to the processes contained within the School's handbooks.

Student Safety

Safety comes first at Providence High School. Every employee contributes to our Emergency Operations Plan by supporting each other at all times, valuing teamwork and placing student safety above all else. Our intent is to always provide a safe, quiet, comfortable, and clean learning environment for every student we serve.

We put student safety first by putting our first and best efforts into safety precautions. When safety is involved, we pay more attention, and we are more vigilant. We make reliability a reality by working together as collegial teams. We are all equals in student safety. We keep our students safe by communicating the right information, the right way, at the right time. We keep our students safe by thinking together in teams. We improve student safety every day by reporting events and problems and learning from others' experiences.

Student Rights

All employees are guided by the appropriate rules of discretion, and are not to discuss publicly, nor pass on, personal details about students, parents, or fellow employees, unless the person concerned expressly gives permission. This is especially true about "loose" conversations that take place in the employee lounge, multi-purpose room, workrooms, hallways or anywhere else on campus. However, nothing in this policy is intended to in any way inhibit employees from reporting harassment, discrimination, retaliation, bullying, abuse, or any potential violations of law or policy. Concern for confidentiality will not justify any failure to report. In all instances, members of the Administration are to be informed of details that pertain to the well-being of the students, families, and employees of Providence High School.

Student Information and Privacy

The School treats the personally identifiable information (PII) of our students with special care, including personal health information (PHI) where applicable. There are numerous federal and state laws that protect the privacy and security of a student's PII, including the Family Educational Rights and Privacy Act (FERPA) and Health Insurance Portability and Accountability Act (HIPAA).

We collect information to provide high-quality education and services and will protect access to this information whether it is contained in a computer system, student record or other documents. Consistent with FERPA and applicable state laws, we do not access, use, disclose or discuss student-specific information with others unless it is necessary to serve the student or complete our job duties, is required by law or necessary in order to meet legal obligations, or the student/authorized representative has authorized the release.

Report suspected theft, loss or inappropriate uses or disclosures of student information promptly to your direct supervisor and compliance/privacy office or the Providence Integrity Line at [888.294.8455](tel:888.294.8455).

Best Practices for Safeguarding Student Information

- Do not leave student information visible on computer screens. Lock your screen or log off your workstation when away.
- Do not leave records or other confidential information open and visible on desks or counters.
- Shred printed documents containing student data when you are done with them or place them in designated secure shred bins.
- Use only the minimum necessary information for academic and operations purposes.
- Avoid student-related discussions in public areas and on social networking sites.
- Avoid informal or casual discussions of student situations not directly related to care.
- Do not leave voice or phone messages containing sensitive information.
- Avoid inadvertent disclosures by taking special care in situations that are not private.
- Follow secure email and fax policies for transmitting confidential information and sending it to those with a need to know.
- Double-check fax numbers to ensure a fax is directed to the correct recipient. If a fax is sent in error, immediately contact the recipient and request destruction, or return of the fax.
- Do not take student data off site, except as necessary and in accordance with the School's and individual department policies.
- Never leave student data, whether stored on an electronic device or on paper, unattended. It must always be in the possession of a School employee or agent or in a secure location.

2.1.4 Legal and Regulatory Compliance

We set the highest standards for ourselves and for our School.

Credentials and Certification

Providence High School verifies the qualifications of academic professionals who work with our students. The School requires staff to follow all applicable credentialing and certification requirements.

Fraud and Other Dishonest Acts

In order to ensure we use our resources as effectively as possible and that we comply with the law, fraudulent and other dishonest acts are not tolerated. Employees are required to report fraud or other dishonest acts when they have a reasonable basis to believe such an act has occurred. Administration is responsible for educating employees about proper conduct, creating an environment that deters dishonesty and maintains internal controls that provide reasonable assurance of achieving management objectives and detecting dishonest acts.

Examples of fraud or dishonest acts include taking cash or other property; making false time reports; forgery or alteration of documents or reports; improper handling or reporting of financial transactions or audit information; and incurring contractual or other obligations that exceed appropriations.

Gifts and Entertainment

Accepting gifts, gratuities, favors, rewards, and offers of entertainment creates a risk that our judgment and decisions can be influenced. In some cases, acceptance of gifts and entertainment may be considered a violation of federal and/or state laws.

No employee may give any gift, gratuity, favor, entertainment, reward, or any other item of monetary value unless it is of nominal value (less than \$100), is customary in the industry, will not violate any laws and will not influence or appear to influence the recipient's judgment or conduct at the recipient's business.

Gifts accepted from a vendor with a value exceeding \$100 must be documented and/or disclosed in your Conflicts of Interest statement. If you are not required to file an annual statement or the gift is a perishable or consumable gift shared with others, the individual receiving the gift must document and maintain the information for a period of two (2) years from the date of receipt.

Infrequent meals of modest value may be accepted by individual employees in connection with education or business presentations or discussions. Generally, offers of entertainment should not be accepted. If entertainment is offered in conjunction with business discussions, both parties must be present and the offer should be infrequent, of modest value and in a setting conducive to discussing business – such as a business dinner in a restaurant and not a sporting event.

School employees may accept invitations to attend School foundation-sponsored charity events exclusive to the School only if the ticket-giver or sponsor understands it will not influence purchasing decisions. All funds raised at the event must benefit Providence High School. At these events, employees are encouraged to make a donation to the School charity event equal to the value of the ticket, although doing so is not required. If you accept such an invitation, you must complete a Conflicts of Interest statement or add the invitation to your existing statement.

The School's reputation is based on its commitment to integrity in the delivery of quality education and other services. For this reason, School employees are expected to keep relationships with students and their family members, vendors and other third parties impartial, and avoid accepting gifts or other items of value including:

- Meals
- Discounts or free services

- Tickets to events
- Tips and gratuities
- Special favors or loans
- Paid travel for spouses

Cash or cash equivalents (exceeding \$100), such as gift certificates or gift cards, may be accepted only when given to you by the School or a fellow employee. Gift certificates and gift cards are taxable income regardless of their cash value when paid for by the School. You may never accept cash or cash equivalents from anyone outside of the School for activities related to your work at the School. You may direct anyone offering a gift to our Development Office.

Any gift, regardless of value, may not be accepted if the gift is given to you in an attempt to influence your behavior or decision-making.

You may accept an occasional gift of nominal value from a vendor, such as consumable gifts, if shared among employees within your department or unit. Common examples might include a fruit basket or box of chocolates.

Questions to ask before accepting a gift from a non-Providence High School entity or person.

- Is this a personal gift?
- Is this a cash gift? A gift card? A gift certificate? In excess of \$100?
- Would I feel uncomfortable disclosing acceptance of this gift to other School employees, students, friends, or family members?
- Is this gift being offered to me because of my job at the School and/or because I might influence a decision in favor of the donor?

If you answered “yes” to any of the above questions, the gift likely does not meet the School’s ethical standards, our Code of Conduct or legal requirements and should not be accepted.

Conflicts of Interest

Conflicts of interest occur when personal interests or activities influence or appear to influence our actions and decisions. They also occur when you allow another interest to become more influential in your decisions than the interests of the School and its faculty, staff, students, parents, and alumni.

As School employees, we must avoid activities and relationships that may impair our independent judgment and decision-making. We do not use our positions for personal gain or advantage or to assist others, including family members, in profiting in any way at the expense of the School.

Employees may not partake in any activity or association that creates or appears to create a conflict between the employee’s personal interests and the School’s interests. In addition, an employee must not allow any situation or personal interest to interfere with the exercise of the employee’s independent judgment or with the employee’s ability to act in the best interests of the School. If an employee has any question whether an action or association would violate this policy, the employee must contact their supervisor to obtain advice on the issue.

Conflicts of interest may arise from many sources including, but not limited to, your financial interests or those of a family member; service, employment, or consulting arrangements with a

competitor; the receipt of gifts from vendors or others with whom we do business; or the use of resources to benefit an outside interest or your own personal interests.

The School's Conflicts of Interest policy provides additional guidance to faculty, directors, officers, senior managers, researchers, and other key employees. These individuals are required to complete and submit a Conflicts of Interest Statement annually.

Other employees are required to disclose to their immediate supervisors or Leadership any real or potential conflicts of interest prior to making any decision or taking any action that is or may be affected by the conflict. The interest must also be disclosed in writing by submitting a conflicts of interest form.

Potential conflicts of interest are reviewed and acted on as required.

2.1.5 Workplace Environment Standards

We strive to care wisely for our people, our resources, and our earth.

Employee Information

During the hiring process, the School collects personal information about employees. To protect our employees' personal information and right to privacy, the School will:

- Take measures to safeguard personal information.
- Protect the confidentiality of personal information when dealing with third parties.
- Restrict access to such information to the employee and those with a legitimate business or legal need.

Discrimination, Harassment/Sexual Harassment and Workplace Violence

At Providence High School, equity, inclusion, and social justice are core to our mission. We are proud to be an equal opportunity workplace and embrace difference for the benefit of our students, families, faculty, and staff. Our goal is to create a diverse learning community where every employee is known, cared for, and supported. As such, Providence is committed to maintaining a responsive and inclusive workplace free of discrimination, harassment, violence, and any other abusive conduct. Mindful of our mission to be expressions of God's healing love, we employ and support people from all walks of life. Providence High School, by virtue of this policy, prohibits any and all discrimination or harassment on the basis of any race (including traits associated with race, such as natural and protective hairstyles), color, ancestry, national origin (including language use), citizenship, religion or religious creed (including religious dress and grooming practices), sex (including pregnancy, childbirth, breastfeeding, reproductive choices, and medical conditions related to pregnancy, childbirth or breastfeeding), marital status, domestic partnership status, sexual orientation, gender, gender identity or gender expression, military or veteran status, family care or medical leave status (including requests for, use of, or denial of family care or medical leave), age, physical or mental disability, medical condition, genetic characteristics or information, political affiliation, any combination of these characteristics, any protected status of an employee's associates or relatives, or any other basis protected by applicable federal, state or local law, rule, ordinance or regulation.

Discrimination is prohibited with respect to all the rights and privileges generally accorded or made available to all employees of the School, including with respect to hiring, promotion, compensation, transfers, training, discipline, demotion, and termination.

Providence believes in respecting the dignity of every employee and expects every employee to show respect for all of our colleagues, students, visitors, and vendors. Respectful, professional conduct furthers the School's mission, promotes productivity, minimizes disputes, and enhances our reputation. Accordingly, this policy forbids any unwelcome, offensive, or harassing conduct that is based on any of the characteristics outlined above. Providence will not tolerate any conduct that violates this policy.

This policy forbids any employee, administrator, contractor, parent, or other third party from discriminating against, harassing, or retaliating against any other School employee, administrator, contractor, parent, or other third party.

The conduct prohibited by this policy includes any unwelcome, offensive, or harassing conduct, whether verbal, physical, or visual, that is directed at or inflicted on someone (intentionally or unintentionally) because of that individual's protected characteristic. Harassment based on any of the protected characteristics listed above is prohibited. Examples of conduct prohibited by this policy include, but are not limited to, epithets, slurs, negative stereotyping, intimidating acts, and the circulation or posting of derogatory or offensive written or graphic materials based on a characteristic protected by federal, state, or local law.

The School prohibits all such conduct in the workplace, even if the conduct is not sufficiently severe or pervasive to constitute a violation of law.

Sexual harassment is an issue that deserves special mention. Unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct based on sex constitutes improper sexual harassment when: (1) submission to such conduct becomes an implicit or explicit term or condition of employment; (2) submission to or rejection of the conduct is used as the basis for any employment decision; or (3) the conduct is sufficiently severe or pervasive so as to have the purpose or effect of (a) unreasonably interfering with an individual's work performance or (b) creating an intimidating, hostile or offensive work environment.

This policy forbids inappropriate sexual conduct regardless of whether or not it rises to the level of a legal violation. Examples of conduct forbidden by this policy include, but are not limited to: (1) offensive verbal conduct such as sexual jokes, teasing, or kidding; (2) repeated unwanted sexual flirtations, advances or propositions; (3) verbal abuse of a sexual nature; (4) graphic or degrading comments to an individual or about that individual's appearance or sexual activity; (5) offensive visual conduct such as leering, making sexual gestures, or displaying sexually suggestive objects, pictures, cartoons, or posters; (6) unwelcome pressure for sexual activity; (7) sexually suggestive or obscene letters, notes, or invitations; and (8) offensive physical contact such as patting, grabbing, pinching, brushing against another's body, or invading another's personal space. Online sexual harassment training courses are available at <https://calcivilrights.ca.gov/shpt/>.

This policy also forbids sexual favoritism in the making of any employment decision. Sexual favoritism occurs whenever an employee makes a decision based upon another's receptiveness to sexual advances. The School prohibits such conduct even if it does not rise to the level of a legal violation.

Bullying is the act of intimidating or mistreating someone weaker or in a more vulnerable situation. This includes harassing conduct that is not based on a protected characteristic. Bullying is also prohibited by this policy.

Employees also may not act violently or make threats. Violence in the workplace means a single behavior or series of behaviors that constitute actual or potential assault, battery, harassment, intimidation, threats or destruction to person or property that occurs while using School resources, at the school/work location or while engaged in the School's business. The School does not prohibit an employee from exercising the legal right to defend oneself, another, or property. However, employees must make every effort to walk away from a fight and are expected to avoid fighting even when provoked or insulted.

No form of harassment, discrimination or workplace violence will be tolerated. Any such conduct is prohibited and will result in disciplinary action, up to and including dismissal. No employees, including the highest-ranking individuals at the School, are exempt from the requirements of this policy.

If an employee experiences, witnesses or learns of any discrimination, harassment, workplace violence, bullying or other abusive conduct at the School, the employee must immediately report it to School administration, Human Resources, or the Providence Integrity Line. Supervisors must notify Human Resources if they receive a report of conduct in violation of this policy, or if they observe or otherwise become aware of such conduct. This policy does not require reporting such conduct to an individual who has engaged in or ratified the conduct at issue.

All reports of conduct that are inconsistent with this policy will be addressed through a fair, timely, and thorough investigation. Investigations will be conducted by qualified personnel in a prompt and impartial manner and will be documented and tracked. Confidentiality will be maintained to the fullest extent possible, subject to the need to conduct a thorough investigation. All parties will be afforded appropriate due process. During an investigation, Providence may need to put interim measures in place, such as a leave of absence or a transfer, while the investigation proceeds. At the conclusion of the investigation, the School will draw reasonable conclusions based on the evidence collected. If an investigation reveals that a violation of this policy or other inappropriate conduct has occurred, the School will take corrective action, including disciplinary action, up to and including termination, as is appropriate under the circumstances, regardless of the positions of the parties involved. Harassment and discrimination can also violate the law, and unlawful harassment may subject an individual to personal liability.

The School may discipline an employee for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law, or even of this policy. If the person who engaged in the conduct is not employed by the School, the School will take whatever corrective action is reasonable and appropriate under the circumstances.

Consistent with applicable law, Providence maintains posters regarding unlawful harassment, among other things. These posters identify governmental agencies to contact for information on how and when to file administrative claims. Using the School's complaint process does not prevent an employee from filing a claim with a state governmental agency such as the California Civil Rights Department ("CRD") or with a federal agency such as the Equal Employment Opportunity Commission ("EEOC"). The CRD and the EEOC may be contacted at their local offices, as listed on their websites or in the telephone directory.

No person will be retaliated against or otherwise adversely affected in employment with the School as a result of making a good faith complaint of discrimination, harassment, bullying, or

violence, assisting another person in making such a complaint, participating in an investigation of discrimination, harassment, bullying, or violence, or filing an administrative claim with a state or federal governmental agency. All employees who experience or witness any conduct they believe to be retaliatory should immediately follow the reporting procedures stated above. Reports of retaliation will be investigated and addressed in the same manner as reports of discrimination or harassment, as set forth in this policy.

All employees have a personal responsibility to conduct themselves in compliance with this policy and to report any observations of conduct inconsistent with this policy.

Health and Safety

Providence High School complies with government regulations. Our policies and practices also promote the protection of workplace health and safety. We share a responsibility in understanding how these policies and practices apply to our job responsibilities and we seek advice when we have a question or concern. Additionally, Providence High School is committed to ensuring the health and safety of the children entrusted to its care.

Our policies and practices promote the protection of workplace health and safety. We share a responsibility in understanding how these policies and practices apply to our job responsibilities and we seek advice when we have a question or concern.

In order to maintain a safe and healthful working environment, the School maintains an Injury and Illness Prevention Program (IIPP). All employees have access to the IIPP, which outlines safety rules, emergency action plans, and the School's communication system. Employees should carefully review the IIPP at their time of hire and should refer to the IIPP for details regarding both the School's and the employee's responsibilities for safety and health, what to do in the event of an injury or emergency, how to report a potential or actual safety hazard, and other safety and health-related policies and procedures.

We have an obligation to report any workplace injury or any situation presenting a danger of injury, so timely corrective action may be taken to resolve the issue. Employees are required to immediately report any injuries, no matter how minor they may seem.

Weapons of any kind are prohibited on campus whether or not a permit is held. This includes, but is not limited to, knives, guns, ammunition, and explosive devices.

Reporting Work-Related Accident or Injury

Employees must immediately report to their supervisors all work-related injuries to a person or property and complete all paperwork requested by the School. Reports must be made within 12 hours of the incident to the Director of Human Resources.

Stewardship of Providence High School Resources

The School is committed to effective stewardship of its resources in support of its academic and other organizational goals. Our assets should be used only for legitimate business purposes. Incidental and minor personal use of computers is permitted, provided such use is not for personal financial benefit or gain, and does not interfere with your job or the ability of others to do their jobs.

2.1.6 Business and Financial Information

We strive to transform conditions for a better tomorrow while serving the needs of today.

Style Guide/Brand Standards

The approved Providence High School brand covers all representations that identify the School, including its official titles, logo, trademarks, slogans, business names, seals, mascots, and domain names. Use of this brand is protected and must be approved by the School administration as well as Providence Health & Services. All use of the brand must follow the guidelines set by the [official Style Guide](#).

Branding that introduces a new visual identifier (for example, logo, color, or domain name) outside the specifications of the Style Guide is not allowable unless approved in accordance with this Code of Conduct by Providence Marketing and Communications.

Creation of alternative brands using Providence intellectual property, regardless of whether the crest or other traditional School visual identifiers are incorporated, potentially detracts from the impact and recognition of the School's approved brand. Such use is not allowable without approval by Leadership and/or the Marketing and Communications team.

Security, Confidential Information and Electronic Media Use

In addition to safeguarding a student's information, employees have a responsibility to protect all confidential information. Confidential information includes sensitive internal documents, records or data that could damage the School if that information were lost or made public. Examples of confidential information include student information, financial information, Social Security numbers, advancement/development data and information subject to federal and state notification laws.

This information is so valuable that loss of this kind of data could harm our students and families and our ability to do business. Data losses also have a negative effect on the School's reputation in the community.

Any confidential information removed from a work location increases our risk. Unless it is part of your job, confidential information should never be removed from the School grounds without prior authorization from your supervisor. If you are authorized to remove such information, you are responsible for following the security procedures required by the School. Confidential information may never be copied onto a personal or non-School computer. If you use a mobile device for work, such as a tablet or smartphone, contact your Information Services group for security instructions.

Employees must agree to follow the School's Acceptable Use Policy and other security policies and standards. Users of the School email and internet, and other School-owned communications systems, have no right or expectation of privacy in any messages sent or received on such systems. Providence reserves the right to monitor and access any School information system or account.

Nothing in this Code of Conduct is intended to restrict employees from discussion, transmission or disclosure of wages, hours and working conditions in accordance with applicable federal and state laws.

Technology Resources

Employees must use the School's internet, email, and all technology resources in an appropriate, ethical, and professional manner. This includes but is not limited to, complying with the Providence High School Campus Computer Network policy located on the campus information portal.

The School's computer system, including the servers/mainframe/network/standalone computers, software, e-mail (whether on School servers, Internet Service Providers, or e-mail service providers) and any online or internet access, is the property of the School. Employees are authorized to use the computer system only for School purposes. Employees are not permitted to use or download School-owned software for personal use outside of the School. Employees may not use any non-School provided e-mail, electronic storage, or similar systems for work. Employees should conduct personal e-mail communications only through personal accounts.

It is vital to maintain the security of the computer system. Therefore, employees are required to keep log-in protocols and passwords confidential and disclose them only to other School employees on a need-to-know basis. Upon request, employees are required to provide their computer, e-mail, and work-related online passwords to the School.

Always use care in addressing e-mail messages to make sure that messages are not inadvertently sent to outsiders or the wrong person inside the School. Refrain from routinely forwarding messages containing confidential information to multiple parties unless there is a clear business need to do so.

Since some software programs may be incompatible with the School's computer systems or may contain viruses, employees may not install any software onto their computer without prior approval. Only licensed software may be installed on the School's computer systems.

All documents on School systems, including e-mail, voicemail, and online messages, are School documents. The School reserves the right to monitor, access, print and disclose computer documents, including any communications sent or received using the School's systems, at any time and for any legitimate business reason, such as to investigate suspected misconduct, locate needed information, satisfy a legal or governmental request, monitor employee performance and compliance with policies, or protect the School's interests, regardless of whether or not a personal account is being used.

System security features, including passwords and message delete functions, do not diminish the School's ability to access any message on its systems at any time, including after deletion by the employee. However, employees must retain and not delete any emails or other computer documents or messages that they are instructed by the School to preserve.

Employees should not use School systems to send, receive or store any information that they wish to keep private.

Employees should treat the School's systems like a shared file system - with the expectation that files sent, received, or stored anywhere in the system will be available for review.

It is impossible to list every type of activity that would be considered an improper use of the School's computer system. However, the following are some examples of activities that are not permitted when using the School's computer system:

- Using the computer system for any unlawful purpose or to store or transmit unlawful material. Examples of unlawful material include child pornography, libelous and defamatory material, and copyrighted, trademarked, and other proprietary or confidential material used without proper authorization from the owner of the rights thereto. The School's computer systems may not be used to access or store pornography of any kind.
- Using threatening, obscene, or abusive language in connection with the computer system.
- Using the computer system in a manner that disrupts the normal use of the system for other users, including sending unsolicited e-mail or advertising, or making unauthorized attempts to access the systems and networks of others.
- Using the computer system to harass other employees or members of the public, including making remarks regarding race, color, national origin, disability status, sexual orientation, or any other protected characteristic; making remarks that are defamatory toward any person; making remarks that could be construed as harassment, including sexual harassment; or distributing materials that otherwise violate School policies.
- Using the computer system to pursue personal business or activities, such as selling personal items or soliciting for personal charities.
- Storing or transmitting programs containing viruses, trojans, or other tools to compromise the security of the School or other sites.

Violation of this policy is grounds for disciplinary action, up to and including termination. The School will investigate employee misconduct involving the use of the computer system that is made the subject of a complaint or is otherwise brought to the School's attention. Investigations may include accessing the employee's stored communications, either on personal or School-owned devices.

Social Media Use

Social media (such as Facebook, Twitter/X, Instagram, Snap Chat, YouTube, TikTok, blogs, etc.) bridge both the professional and personal lives of employees and thus, some crossover and conflict of responsibilities may occur. The School's interest is in defining the educational and work-related contexts of social media, for the protection of employees, students, and the School community as a whole.

In essence, interacting online with colleagues, students, parents, and alumni is no different from interacting with these individuals or groups face-to-face. We are required to maintain the principles of respect, dignity, prudence and professionalism and concern for the safety and protection of children in all interactions.

Unless required by their position, employees may not engage in social media posting during work time. When posting in a non-School forum, if the post in any way identifies the School or discusses Providence or its operations, you must identify yourself as a Providence employee, speak in the first person, and make it clear that what is being said is representative of your personal views and opinions and does not necessarily reflect the views and opinions of the School. In no way may you represent or suggest that your opinions or positions are endorsed by the School or any of its employees.

Employees must always be in compliance with the School's policies regarding non-disclosure of confidential information, trade secrets and other proprietary information. Accordingly, employees are prohibited from revealing, or making any reference to, any confidential information, trade secrets, or other proprietary information covered by such a policy. Harassing or otherwise improper communications via social media may also violate our conduct policies, even if the communications are made on an employee's own time and using an employee's own device.

Security Best Practices and Cyber Hygiene

Keep your computer and voice mail passwords private and secure. Change your password if you think it has been compromised.

- Lock your computer (PC) when unattended using Ctrl-Alt-Delete | Enter or other key combinations that will lock your PC.
- Install a privacy guard or use automatic timeout to prevent others from seeing your computer screen.
- Employees should never download confidential information onto a home or non-School PC or personal devices.
- Store shared portable devices and electronic media in a secure location and use a sign-in/sign-out procedure.
- These portable devices and external electronic media must be encrypted if storing sensitive information.
- Maintain physical control of laptops and other devices at all times when outside of a secure facility – a locked location within the School and your locked residence are considered secure facilities.
- Locked vehicles are not considered a secure location.
- Shut down your laptop so that encryption can protect confidential data if your laptop is lost or stolen.
- Use email encryption when sending confidential information to an external email address.
- Beware of phishing attempts and review emails before responding or clicking on links. If you believe it is phishing, use the appropriate avenues to report such as the service desk or the "Report Phishing" button available in Outlook.
- As scams become more sophisticated, employees should be aware of fraudulent activity on mobile devices in the form of smishing or mobile scams where an attacker may impersonate a supervisor through text messages.
- School employees and other workforce members must report all known or suspected security incidents as soon as possible, and in all cases within 48 hours of occurrence. Report any incidents to our IT Department.

Records Accuracy and Retention

We prepare and maintain accurate and complete documents and records. We do this to comply with regulatory and legal requirements and to support our business practices and actions. Records include financial reports, employee time sheets, student records and expense-related forms and other types of records, whether in paper or electronic formats.

We do not alter or falsify records and do not destroy records to deny governmental authorities' information that may be relevant to a government investigation.

We comply with Providence's Record Retention policy to support the appropriate retention, protection, maintenance, and disposition of all records, regardless of their format or media.

2.1.7 For More Information

Providence High School

Human Resources: [818.846.8141](tel:818.846.8141)

Providence Health & Services

- Integrity, Compliance and Privacy Office: [818.847.3158](tel:818.847.3158)
- System Integrity, Compliance and Privacy Office: [425.525.3022](tel:425.525.3022)
- Department Of Legal Affairs: [206.233.7338](tel:206.233.7338)
- Information Services Help Desk: [844.922.7548](tel:844.922.7548)
- Integrity Line: [888.294.8455](tel:888.294.8455) (Toll Free)