



Internal Complaint Review Policy

Board Approved: June 17, 2026

The purpose of the Internal Complaint Review Policy is to afford all employees of Empower Generations (the “School”) the opportunity to seek internal resolution of their work-related concerns. All employees have free access to School administration or the Board of Directors to express their work-related concerns.

Specific complaints of unlawful harassment, discrimination, and retaliation are addressed under the School’s Harassment, Discrimination, and Retaliation Prevention policy.

Internal Complaints

(Complaints by Employees Against Employees)

This section of the policy is for use when a School employee raises a complaint or concern about a co-worker.

If reasonably possible, internal complaints should be resolved at the lowest possible level, including attempts to discuss/resolve concerns with the immediate supervisor. However, in the event an informal resolution may not be achieved or is not appropriate, the following steps will be followed by the School:

1. The complainant will bring the matter to the attention of the School Director as soon as possible after attempts to resolve the complaint with the immediate supervisor have failed or if not appropriate; and
2. The complainant will reduce their complaint to writing, indicating all known and relevant facts. The School administrator or designee will then investigate the facts and provide a solution or explanation;
3. If the complaint is about a School administrator, the complainant may file their complaint in a signed writing to Human Resources, who will then investigate the facts and provide a solution or explanation. The employee may also file their complaint with the Board of Directors, who will then confer as a board and may conduct a fact-finding (or authorize a third party investigator on behalf of the board). A board member or investigator will report their findings to the board for review and action, if necessary.

This policy cannot guarantee that every problem will be resolved to the employee’s satisfaction. However, the School values each employee’s ability to express concerns and the need for

resolution without fear of adverse consequence to employment.

Policy for Complaints Against Employees (Complaints by Third Parties Against Employees)

This section of the policy is for use when a non-employee raises a complaint or concern about a School employee.

If complaints cannot be resolved informally, complainants may file a written complaint to the School administration or Human Resources (if the complaint concerns a School administrator) as soon as possible after the events that give rise to the complainant's concerns. The written complaint should set forth in detail the factual basis for the complaint.

In processing the complaint, the School shall abide by the following process:

1. The School administrator, designee, or Human Resources shall use their best efforts to talk with the parties identified in the complaint and to ascertain the facts relating to the complaint.
2. In the event that the School administrator, designee or Human Resources finds that a complaint against an employee is valid, the School administrator, designee or Human Resources may take appropriate disciplinary action against the employee. As appropriate, the School administrator, designee, or Human Resources may also simply counsel/reprimand employees as to their conduct without initiating formal disciplinary measures.
3. The decision of the School administrator, designee, or Human Resources relating to the complaint shall be final unless it is appealed to the Board of Directors. The decision of the board shall be final.

General Requirements

Confidentiality: All complainants will be notified that information obtained from the complainants and thereafter gathered will be maintained in a manner as confidential as possible, but in some circumstances absolute confidentiality cannot be assured.

Non-Retaliation: All complainants will be advised that they will be protected against retaliation as a result of the filing of any complaints or participation in any complaint process.

Resolution: The School will investigate complaints appropriately under the circumstances and pursuant to the applicable procedures, and if necessary, take appropriate remedial measures to ensure effective resolution of any complaint.



INTERNAL COMPLAINT FORM

Your Name: _____ Date: _____

Address: _____

Phone: _____ Email: _____

Date of Alleged Incident(s): _____

Name of Person(s) you have a complaint against: _____

List any witnesses that were present: _____

Where did the incident(s) occur?

Please describe the events or conduct that are the basis of your complaint by providing as much factual detail as possible (i.e. specific statements; what, if any, physical contact was involved; any verbal statements; what did you do to avoid the situation, etc.). Attach additional pages, if needed:

I hereby authorize the School to disclose the information I have provided as it finds necessary in pursuing its investigation. I hereby certify that the information I have provided in this complaint is true and correct and complete to the best of my knowledge and belief. I further understand that providing false information in this regard could result in disciplinary action up to and including termination or expulsion from the School.

Signature of Complainant

Date: _____

Print Name

To be completed by the School:

Received by: _____

Date: _____