



AC

**CROYDON SCHOOL DISTRICT
NONDISCRIMINATION AND EQUAL
OPPORTUNITY POLICY**

Purpose: To prevent discrimination and ensure equal opportunity for students and employees in all district educational programs, activities and employment..

Legal References: NH RSA 186:11(XXXIII), 193-F, 193:38, 275:71/78-83, 354-A; NH Ed Rule 303.01(i); Federal: 20 USC 1681 et seq. (Title IX), 1400-1417 (IDEA), 29 USC 621 et seq. (ADEA), 705/794 (Section 504), 42 USC 12101 et seq. (ADA), 2000c/d/e et seq. (Civil Rights), 2000gg (PWFA), 218d (PUMP Act); 89 FR 29182 (PWFA).

Cross-References: ACA, ACAC, ACD, ACE, ACF, ACN, EF, EFAA, GBAM, GBI, GDB, IHBA, IHBAM, IHBG, IKG, JICK (and forms), JJA, KEE, KFA.

A. General Policy

The Croydon School District is committed to providing an environment free from discrimination, harassment, and retaliation for all students, staff, and participants in district programs, activities, or employment. No person shall be excluded from, denied benefits of, or subjected to discrimination or harassment based on protected characteristics, including age, race, color, religion, creed, sex, national or ethnic origin, gender identity, sexual orientation, marital status, familial status, physical or mental disability, pregnancy, genetic information, veteran status, or economic status. This policy extends beyond minimum legal requirements under state and federal laws (e.g., NH RSA 354-A, RSA 193:38-39, Titles IV/VI/VII/IX of the Civil Rights Act, IDEA, Section 504, ADA, ADEA, PWFA) to treat any such conduct as misconduct, even if it doesn't meet legal thresholds for illegality. Bullying or harassment not tied to protected characteristics is prohibited under Policy JICK and RSA 193-F.

B. Key Definitions

- **Discrimination:** Treating a person or group differently in violation of law or policy based on a protected characteristic (listed above) or a belief that such a characteristic exists.

- **Harassment:** Words or behaviors that annoy, threaten, intimidate, or demean without legitimate purpose, often constituting bullying under JICK. It becomes discriminatory if tied to a protected characteristic.
- **Retaliation:** Intimidation, threats, coercion, or discrimination against someone for reporting, participating in, or refusing to participate in an investigation under this or related policies.
- **Complaint/Grievance:** A verbal or written report of discrimination, harassment, or retaliation that requests district investigation and resolution.
- **Days:** Calendar days, excluding weekends, holidays, office closures, or school closures (e.g., snow days).

C. Scope and Application

This policy applies to all district employees, students, vendors, visitors, and participants in district-supervised sites or activities, including school property, buses, field trips, events, and off-site conduct that disrupts education or operations (per JICK).

D. Reporting Procedures

Anyone who experiences, witnesses, or suspects discrimination, harassment, bullying, or retaliation should report it promptly. Employees must report incidents they witness or learn about, and may intervene safely if they have supervisory authority. Failure to report or providing false information may lead to discipline, up to dismissal.

Use the following paths based on the issue (forms and details in referenced policies):

Type of Report	Policy Procedure	Contact
Sex discrimination, sex-based harassment, or sexual violence	ACAC (Title IX)	Title IX Coordinator
Disability discrimination in education (IDEA)	ACE	504/ADA Coordinator
Bullying or general harassment of students	JICK	Building Principal or Human Rights Officer
Other discrimination, harassment, or retaliation (e.g., race, religion, disability under ADA/504, not involving food services)	ACA	Human Rights Officer

Type of Report	Policy Procedure	Contact
Discrimination in food/nutrition programs (e.g., school lunches)	ACF	Human Rights Officer (unless tied to sex or IDEA)

Reports not covered above go to the Human Rights Officer. Investigations follow the referenced policies' procedures.

E. Alternative Remedies and Legal Options

Individuals may file complaints externally at any time, such as with the U.S. Department of Education's OCR (within 180 days), NH Commission for Human Rights, or other agencies (contacts in AC-R(2)). Police reports or criminal prosecution remain options. This policy does not replace other mandatory reporting (e.g., child abuse under RSA 169-C, violence under RSA 193-D).

F. Retaliation Prohibited

No retaliation against reporters, witnesses, or participants in investigations. Charging someone with a false statement in bad faith is not retaliation if based on evidence beyond just discrediting the statement.

G. Designated Officers and Contacts

The Senior Education Officer assigns and annually updates contacts for:

- Human Rights/Nondiscrimination Officer–SEO
- Title IX Coordinator–SEO
- 504/ADA Coordinator–SEO

H. Required Nondiscrimination Statements and Notices

1. **Educational Programs/Activities:** No exclusion, denial of benefits, or discrimination based on protected characteristics (including race-defined traits like hair texture/protective hairstyles: braids, locs, coils, cornrows, Bantu knots, Afros, twists, headwraps). Harassment not tied to these is covered by JICK.
2. **Employment:** The District is an Equal Opportunity Employer, prohibiting discrimination/harassment based on protected characteristics or victim status (domestic violence, etc.).
3. **USDA (Food Programs, from ACF):** In accordance with federal civil rights law and USDA regulations, this institution prohibits discrimination on the basis of race, color, national origin, sex (including gender identity/sexual orientation), disability, age, or reprisal/retaliation for prior civil rights activity. Program info

available in other languages; accommodations for disabilities via USDA TARGET Center (202-720-2600) or Federal Relay (800-877-8339). File complaints via Form AD-3027 (online at USDA site), mail to USDA Office of Assistant Secretary for Civil Rights (1400 Independence Ave SW, Washington DC 20250-9410), fax (833-256-1665 or 202-690-7442), or email program.intake@usda.gov.

4. **Title IX (from ACAC):** The District prohibits sex discrimination in any education program/activity it operates, as required by Title IX. Full notice in AC-R(2) and district website (www.croydonsd.org), including Coordinator contact. Disseminate in handbooks, catalogs, announcements, etc. Alternative short notice: "The District prohibits sex discrimination. Report to Title IX Coordinator; full notice at www.croydonsd.org. Refer to ACAC for complaints."

I. Additional Provisions

- **Agency Collaboration:** Share information as needed for investigations or compliance, following confidentiality laws (e.g., student/employee records). Retain documentation per policy and law.
- **Other Reporting:** This supplements mandates like Educator Code of Conduct (GBEAB), child abuse (JLF), violence (RSA 193-D), bullying (JICK), hazing (RSA 671:7).
- **Procedures and Training:** The Senior Education Officer-develops implementing procedures, regulations, and training.
- **Notice Dissemination:** Provide to applicants, employees, students, parents, and others as required.

Change History

Revision	Description	Date
1	Initial release.	10/21/2025

First Read: October 2, 2025

Second Read & Adoption: October 21, 2025