

Community Health & Wellness Center of Greater Torrington 	Harassment	Policy # 2.003 Date Effective: 07/15/2015
Human Resources Management	Date of Origin:	06/18/2015
Review	Date of Review:	06/22/2017
Revision	Date of Revision:	
Approved By: Chief Executive Officer	Date Approved:	06/23/2017
Approved By: Board of Directors	Date Signed:	06/28/2017

Purpose:

To promote a positive work environment for Community Health & Wellness Center of Greater Torrington (“CHWC”) employees and ensure compliance with all state and federal laws.

Policy:

Community Health & Wellness Center of Greater Torrington is committed to providing an environment free from harassment including, but not limited to sexual harassment.

Scope:

Applies to all employees and may, under certain circumstances, apply to contractors, and non-employees or Board of Directors who have contact with company employees.

Provisions:

1. Employees in a supervisory, managerial or leadership role are required to provide prompt and appropriate follow-up upon notification of an allegation of harassment.
2. Every report of alleged harassment will be fully investigated by the manager, in consultation with Human Resources, and corrective action will be taken where

appropriate, up to and including discharge for any employee(s) who violates this policy.

3. CHWC will not tolerate any form of retaliation against individuals who report alleged harassment or who cooperate in the investigation of such reports in accordance with this policy. Retaliation is unlawful. Any form of retaliation in violation of this policy will result in disciplinary action, up to and including discharge.

Definition:

Sexual harassment means sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

1. Submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or
2. Such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment. Sexual harassment may include any hostility directed to employees because of their gender (including same gender), even if that hostility is not sexual in nature.
3. While it may not be easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually suggestive posters, calendars or graphic magazines, pictures or objects, epithets and derogatory slurs; sending sexually explicit e-mail, text messages or voice-mail, and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually-related comments. Depending upon the circumstances, the conduct can also include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, teasing or other conduct directed toward a person because of his or her gender which is sufficiently severe or pervasive to create an unprofessional hostile working environment. Physical conduct such as assault, blocking normal movement or interfering with an employee's work is considered harassment.

Forms of harassment include severe and pervasive conduct that offends an individual's race, color, religion, creed, age, national origin, ancestry, citizenship, physical or mental disability, medical condition, marital status, and sexual orientation or military/veteran status.

Sexual and other forms of harassment based on an individual's protected status are unlawful.

Procedure:

1. CHWC encourages any employee who believes that he or she is the subject of harassment to immediately inform the individual whose behavior (including language and/or actions) is offensive.
2. If the employee is not comfortable directly informing the individual, or the behavior continues or the initial behavior is such that the employee wishes to report it, he or she has the right and the duty to report the incident directly to his or her immediate supervisor. If the supervisor is unavailable or an inappropriate person to contact, the employee should contact the supervisor's supervisor or Human Resources.
3. Any report made to a supervisor must be immediately reported to Human Resources. Complaints also may be made directly to the Anonymous Hot Line (860-489-0931 x 218). CHWC advises employees to follow the compliance reporting process as delineated in the Complaint Policy.
4. Employees may file a report with the Compliance Officer/Human Resources or their respective state agency.
5. The manager will promptly investigate all incidents of alleged harassment under the direct guidance of Human Resources. In certain instances, the Compliance Department will initiate and oversee such investigations. CHWC will attempt to limit the number of persons made aware of the claim except to the extent necessary to conduct a thorough investigation and take corrective action. The alleged harasser and any witnesses will be contacted confidentially, with anonymity preserved to the extent possible. However, complete resolution of the issues may make it impossible to preserve such confidentiality.
6. The investigation will be conducted in accordance with the following steps, as appropriate:
 - a. Interview the complainant to determine the issue and the complainant's opinion of the action to be taken.
 - b. Investigate the allegation by interviewing witnesses or other individuals who could possibly corroborate either position.
 - c. Interview the individual accused as the harasser; determine the validity of the complaint.
 - d. Conclude the investigation within a reasonable time frame, which will depend upon the circumstances.
7. At the conclusion of the investigation, the manager or Human Resources will meet with the individuals involved and communicate the disposition of the complaint. The results of all investigations will be reported to the Chief Executive Officer.
8. In accordance with the Complaint Policy no retaliation of any kind will be taken against the complaining individual or anyone who participated in the investigation.

9. In cases where an allegation is substantiated, the harasser will be subject to appropriate disciplinary action up to and including termination of employment.
10. If CHWC determines that an employee knowingly made false accusations of harassment for retribution or other reasons or knowingly made false statements in an investigation, such employee may also be subject to disciplinary action up to and including termination of employment.
11. Documentation of harassment investigations will not be filed in any of the involved employees' personnel files. Information will be secured in Human Resource's Security Files to ensure confidentiality.
12. Any disciplinary action taken will be maintained in the employee's personnel file.
13. Refer questions concerning harassment to Human Resources and/or the Compliance Officer.

