

SEXUAL HARASSMENT POLICY

Partnerships Adult Day Care Center [hereinafter “Partnerships”] is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. Partnerships will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any employee or board member found to have sexually harassed a board member, employee, volunteer, intern, or client will face disciplinary action, up to and including dismissal from employment and/or being barred from the premises. Any client found to have sexually harassed an employee, volunteer, intern, or other client may be barred from the program.

All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimized for making such a complaint.

Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behavior which constitute sexual harassment include, but are not limited to:

Physical Conduct

- Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- Physical violence, including sexual assault
- Physical contact, e.g., touching, pinching
- The use of job-related threats or rewards to solicit sexual favors

Verbal Conduct

- Sexual comments, stories and jokes
- Comments on a worker’s appearance, age, private life, etc.
- Sexual advances
- Repeated and unwanted social invitations for dates or physical intimacy
- Insults based on the sex of the worker
- Condescending or paternalistic remarks
- Sending sexually explicit messages (by phone or by email)

Non-verbal conduct

- Display of sexually explicit or suggestive material
- Sexually suggestive gestures
- Whistling
- Leering

Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. Partnerships recognizes that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed. Anyone, including employees of Partnerships, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded and dealt with in accordance with this internal policy.

All sexual harassment is prohibited whether it takes place within Partnerships, in transit to or from partnerships, at any function sponsored by Partnerships, or between employees or board members outside Partnerships.

Complaint procedures. Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. Partnerships recognizes that sexual harassment may occur in unequal relationships (i.e., between a supervisor and his/her employee) or between a cognitively impaired client and a staff member or between two cognitively impaired clients and that it may not be possible for the victim to inform the alleged harasser. In addition, the victim (or the victim's caretaker) should inform the ranking staff member on premises (either the Executive Director, RN, or LPN) and the President of the Board of Directors. When a designated person receives a complaint of sexual harassment, he/she will:

- Immediately record the dates, times and facts of the incident(s) -
- Ascertain the views of the victim as to what outcome he/she wants -
- Ensure that the victim understands Partnerships' procedures for dealing with the complaint -
- Discuss and agree the next steps
- Keep a confidential record of all discussions -
- Respect the choice of the victim -
- Ensure that the victim knows that they can lodge the complaint outside of Partnerships through the State of Connecticut Commission on Human Rights and Opportunities.

The Board of Directors of Partnerships will investigate any and all complaints of sexual harassment. The person or committee carrying out the investigation will:

- Interview the victim and the alleged harasser separately
- Interview other relevant third parties separately
- Decide whether or not the incident(s) of sexual harassment took place
- Produce a report detailing the investigations, findings, and any recommendations
- If the investigation concludes that harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e.- an apology, an official reprimand to the offending party; disciplinary action, including suspension or termination from employment; or temporary or permanent suspension of a client from Partnerships
- Follow up to ensure that the behavior has stopped and that the victim is satisfied with the outcome

- Keep a record of all actions taken
- Ensure that all records concerning the matter are kept confidential
- Ensure that the process is done as quickly and as expeditiously possible
- If it cannot be determined whether the harassment took place, the Board of Directors may still take any action it deems appropriate to ensure proper functioning of the workplace.

Outside Complaints Mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the Partnerships. They can do so by contacting the State of Connecticut Commission on Human Rights and Opportunity either by telephone or through their website: <https://portal.ct.gov/CHRO>

Sanctions and Disciplinary Measures

Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:

- Verbal or written warning ↯
- Adverse performance evaluation ↯
- Suspension ↯
- Dismissal
- Removal of the harasser from the board of directors

The nature of the sanctions will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial. Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

Implementation of this policy

Partnerships will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook. All new employees and board members will receive a copy of the policy.

CHRO Sexual Harassment Certification

All new employees and board members must complete CHRO Sexual harassment training and provide a copy of the completion certificate to the Executive Director within one month of their start date. All must recertify annually. The Executive Director will keep a record of employee sexual harassment certification in the same way records of in-service medical trainings are kept