



Non-Discrimination and Anti-Harassment Policy

Objective

Casa Central is committed to maintaining a work environment that is free of discrimination and harassment. In keeping with this commitment, Casa Central will not tolerate discrimination against or harassment of its employees by anyone, including any supervisor, coworker, vendor, grantee, contractor, or other regular visitor of the organization. Violation of this policy shall be considered grounds for disciplinary action up to and including termination.

This policy applies to all employees, including supervisors and non-supervisory employees. Supervisors at all levels are required to ensure that this policy is carried out.

Discrimination

Discrimination consists of employment actions taken against an individual based on a characteristic protected by law, such as sex, race, color, ancestry, national origin, citizenship status, religion, age, disability, marital status, sexual orientation, gender identity, pregnancy, military or veteran status, genetic information, order of protection status, or any other category protected by applicable law. In other words, discrimination occurs when an individual is treated differently or unequally because the individual is a member of a protected group.

Harassment

Harassment consists of unwelcome conduct, whether verbal, physical, or visual, that is based upon a person's protected status such as sex, race, color, ancestry, national origin, citizenship status, religion, age, disability, marital status, sexual orientation, gender identity, pregnancy, military or veteran status, genetic information, order protection status, or any other category protected by applicable law. Casa Central will not tolerate harassing conduct that affects tangible job benefits, interferes unreasonably with an individual's work performance, or creates an intimidating, hostile, or offensive working environment.

The conduct forbidden by this policy specifically includes, but is not limited to:

1. Epithets, slurs, negative stereotypes, or intimidating acts that are based on a person's protected status;
2. Written or graphic material circulated within or posted within the workplace that shows hostility toward the person because of his or her protected status;
3. Incivility;

4. Bullying.

Bullying is defined as repeated, health-harming mistreatment of one or more people by one or more perpetrators. It is abusive conduct that includes:

- Threatening, humiliating, or intimidating behaviors.
- Work interference/sabotage that prevents work from getting done.
- Verbal abuse.

Examples of forms of bullying are:

- **Verbal bullying.** Slandering, ridiculing, or maligning a person or his or her family; persistent name-calling that is hurtful, insulting or humiliating; using a person as the butt of jokes; abusive and offensive remarks.
- **Physical bullying.** Pushing, shoving, kicking, poking, tripping, assault or threat of physical assault, damage to a person's work area or property.
- **Gesture bullying.** Nonverbal gestures that can convey threatening messages.
- **Exclusion.** Socially or physically excluding or disregarding a person in work-related activities.

Sexual Harassment

"Sexual harassment" consists of unwelcome sexual advances; requests for sexual favors; and other verbal or physical conduct of a sexual nature when made by any employee to another employee where:

1. Submission to such conduct is made either explicitly or implicitly a term or condition of a person's employment;
2. Submission to or rejection of such conduct is used as the basis for any employment decisions affecting such individual; or
3. Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual harassment, as defined above, may include but is not limited to:

1. Uninvited sex-oriented verbal "kidding" or demeaning sexual innuendos, leers, gestures, teasing, sexually explicit or obscene jokes, remarks, or questions of a sexual nature;
2. Graphic or suggestive comments about an individual's dress or body;
3. Displaying sexually explicit objects, photographs, or drawings;
4. Unwelcome touching, such as patting, pinching, or constant brushing against another person's body;

5. Suggesting or demanding sexual involvement of another employee whether or not such suggestion or demand is accompanied by implicit or explicit threats concerning one's employment status or similar personal concerns.

Sexual harassment can be physical and psychological in nature. An aggregation of incidents can constitute harassment even if one of the incidents considered on its own would not be harassing.

Please keep in mind that an employee may complain about harassment if the employee is subjected to consensual behavior between two or more other employees.

Consensual Romantic or Sexual Relationships

Casa Central strongly discourages romantic or sexual relationships between a manager or other supervisory employee and an employee who reports directly or indirectly to that person, because such relationships tend to create compromising conflicts of interest or the appearance of such conflicts. In addition, such a relationship may give rise to the perception by others that there is favoritism or bias in employment decisions affecting the staff employee. Moreover, given the uneven balance of power within such relationships, consent by the staff member is suspect and may be viewed by others, or at a later date by the staff member, as having been given as the result of coercion or intimidation. The atmosphere created by such appearances of bias, favoritism, intimidation, coercion, or exploitation undermines the spirit of trust and mutual respect that is essential to a healthy work environment. If there is such a relationship, the parties need to be aware that one or both may be moved to a different department or other actions may be taken.

If any employee of Casa Central enters into a consensual relationship that is romantic or sexual in nature with an employee who reports directly or indirectly to that employee, or if one of the parties is in a supervisory capacity in the same department in which the other party works, the parties must notify the HR (Human Resources) director or other appropriate corporate officer. Because of potential issues regarding quid pro quo harassment, Casa Central has made reporting mandatory.

Once the relationship is made known to Casa Central, the agency will review the situation with human resources considering all the facts (reporting relationship between the parties, effect on co-workers, job titles of the parties, etc.) and will determine whether one or both parties need to be moved to another job or department. If it is determined that one party must be moved, and there are jobs in other departments available for both, the parties may decide who will be the one to apply for a new position. If the parties cannot amicably come to a decision, or the party is not chosen for the position to which he or she applied, the HR director and senior management will decide which party will be moved. That decision will be based on which move will be least disruptive to the organization as a whole. If no other jobs are available for either party, the parties will be given the option of terminating their relationship or resigning.

Vendors, Visitors and Participants

Should an employee file a complaint that involves a vendor, visitor, or participant, Casa Central will take the appropriate steps in investigating the claim, as set forth in this policy. If the third-party actions violated Casa Central Anti-Harassment Policy, the agency will take prompt corrective action to make sure the incident does not reoccur.

Filing a Claim

All employees are responsible to help assure that Casa Central avoids harassment and discrimination. An employee who believes that he or she has been subjected to sexual or other types of harassment or discrimination or who has witnessed harassment or discrimination should immediately submit a complaint to their manager, senior manager or any senior manager, or any member of the Human Resources Department.

Casa Central will promptly investigate all complaints and take all reasonable actions to resolve the matter. These efforts may include, but are not limited to, interviewing the complainant and/or the accused harasser/discriminator to discuss the complaint in the results of the investigation. The right to confidentiality, both of the complainant and of the accused, will be respected consistent with Casa Central's legal obligations and with the necessity to investigate allegations of misconduct and to take corrective action when this conduct has occurred.

Employees should not assume that management is aware of any harassment taking place, therefore, employees should follow the above steps in filing a claim if an employee feels that they have been subject to sexual or other types of harassment.

Discipline

Employees who violate this policy are subject to appropriate discipline. A substantiated charge against an employee will subject the employee to disciplinary action up to and including termination. Persons who violate this policy may also be subject to civil damages or criminal penalties.

Managers and Supervisors Responsibilities

Managers and supervisors must deal expeditiously and fairly when they have any knowledge of sexual harassment within their departments, whether or not there has been a written or formal complaint. They must:

1. take all complaints or concerns of alleged or possible harassment seriously no matter how minor or who is involved.
2. Report all incidents to HR immediately so that a prompt investigation can occur.
3. take any appropriate action to prevent retaliation or prohibited conduct from recurring during and after any investigations or complaints.

Managers and supervisors who knowingly allow or tolerate any form of harassment or retaliation, including the failure to immediately report such misconduct to HR, are in violation of this policy and subject to discipline.

Investigation

Human Resources is responsible for:

1. ensuring that both the individual filing the complaint (complainant) and the accused individual (respondent) are aware of the seriousness of the harassment complaint.
2. explaining Casa Central's Anti-Harassment Policy and investigation procedures to all parties involved.
3. exploring informal means of resolving harassment complaints.
4. notifying the police if criminal activities are alleged.
5. arranging for an investigation of the alleged harassment and the preparation of a written report.
6. submitting a written report summarizing the results of the investigation and making recommendations to designated company officials.
7. notifying the complainant and the respondent of the corrective actions to be taken, if any, and administering those actions.
8. determining if an in-house investigation will be conducted or if a third party will be contracted to complete the investigation. All complaints involving senior management at the vice-president level or above will be handled by an external third party.

Retaliation Prohibited

Reporting harassment or discrimination or participating in an investigation will not reflect adversely upon an individual's status or affect future employment. Any form of retaliation against an employee who reports harassment or discrimination or participates in an investigation is strictly prohibited. Any employee who retaliates against another person for exercising his or her rights under this policy shall be subject to discipline, up to and including discharge.

Confidentiality

All complaints and investigations are treated confidentially to the extent possible and information is disclosed strictly on a need-to-know basis. The identity of the complainant is usually revealed to the parties involved during the investigation and the HR director takes adequate steps to ensure that the complainant is protected from retaliation during and after the investigation. All information pertaining to any form of harassment complaint or investigation is maintained in secure files within the HR department.

Resolution Outside of Casa Central

The purpose of this policy is to establish prompt, thorough and effective procedures for responding to every complaint and incident(s) so that the problems can be identified and remediated internally. However, an employee has the right to contact the Illinois Department of Human Rights (IDHR) or the U.S. Equal Employment Opportunity Commission (EEOC) about filing a formal complaint. An IDHR complaint must be filed within 180 days of the alleged incident(s) unless it is a continuing offense. A complainant with the EEOC must be filed within 300 days.

Contact Information:

Illinois Department of Human Rights

- Chicago: 312-814-6200 or 800-662-3942; TTY 866-740-3953

- Springfield: 217-785-5100; TTY: 866-740-3953
- Marion: 618-993-7463; TTY 866-740-3953

United States Equal Employment Opportunity Commission

- Chicago: 800-669-4000; TTY: 800-869-8001

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