



## Anti-Discrimination Policy 1/1/2024

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### **Purpose/Scope:**

*Saint John's is an equal opportunity employer and does not discriminate in the delivery of services. Saint John's is committed to providing an environment free of harassment or discrimination based on sex (including pregnancy, childbirth, breastfeeding or related medical conditions), race, religion (including religious dress and grooming practices), color, gender (including gender identity and gender expression), national origin (including language use restrictions and possession of a driver's license issued under Vehicle Code section 12801.9), ancestry, physical or mental disability, medical condition, genetic information, marital status, registered domestic partner status, age, sexual orientation, military and veteran status, reproductive health decision making or any other basis protected by federal, state or local law or ordinance or regulation. It also prohibits discrimination, harassment, disrespectful or unprofessional conduct based on the perception that anyone has any of those characteristics or is associated with a person who has or is perceived as having any of those characteristics.*

*In addition, the Company prohibits retaliation against individuals who raise complaints of discrimination or harassment or who participate in workplace investigations. All such conduct violates Company policy.*

## Key Principles

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### **Equal Employment Opportunity**

#### **Prohibited Harassment and Discrimination**

The Company's policy prohibiting harassment applies to all persons involved in its operation. The Company prohibits harassment or discrimination based on protected categories by any employee of the Company, including supervisors, managers, and co-workers. The Company's anti-harassment policy also applies to participants, beneficiaries, vendors, independent contractors, unpaid interns, volunteers, persons providing services pursuant to a contract and other persons with whom you come into contact while working.

Prohibited harassment and discrimination based on protected categories in any form will not be tolerated. While such harassing conduct is generally unlawful only if it is severe and pervasive, the Company's policy is a "no tolerance" policy that prohibits all such conduct even though the conduct may not be sufficiently severe or pervasive to constitute a violation of law.

Prohibited conduct includes, but is not limited to, the following behavior:

- Verbal conduct such as epithets, derogatory jokes or comments, slurs or unwanted sexual advances, invitations, comments, posts, or messages.
- Visual displays such as derogatory and/or sexually oriented posters, photography, cartoons, drawings, or gestures.

- Physical conduct including assault, unwanted touching, intentionally blocking normal movement or interfering with work because of sex, race, or any other protected basis.
- Threats and demands to submit to sexual requests or sexual advances as a condition of continued employment, or to avoid some other loss and offers of employment benefits in return for sexual favors.
- Retaliation for reporting or threatening to report harassment; and
- Communication via electronic media of any type that includes any conduct that is prohibited by state and/or federal law or by company policy.

Sexual harassment does not need to be motivated by sexual desire to be unlawful or to violate this policy. For example, hostile acts toward an employee because of gender can amount to sexual harassment, regardless of whether the treatment is motivated by sexual desire.

Prohibited harassment is not just sexual harassment but harassment based on any protected category.

The Department of Fair Employment and Housing provides on-line training on sexual harassment at <https://www.dfeh.ca.gov/shpt/>.

### **Anti-Retaliation**

The Company will not retaliate against you for filing a complaint of harassment or discrimination based on a protected category or participating in any workplace investigation or complaint process, and will not tolerate or permit retaliation by management, employees, or co-workers.

### **Complaint Process**

If you believe that you have been the subject of harassment, discrimination, retaliation, or other prohibited conduct, bring your complaint to your supervisor, if applicable, or to the HR Department as soon as possible after the incident. If you need assistance with your complaint, or if you prefer to make a complaint in person, contact the HR Department. Please provide all known details of the incident or incidents, names of individuals involved and names of any witnesses. It would be best to communicate your complaint in writing, but this is not mandatory.

The Company encourages all individuals to report any incidents of harassment, discrimination, retaliation, or other prohibited conduct forbidden by this policy immediately so that complaints can be quickly and fairly resolved. Any supervisor or manager who becomes aware of possible prohibited conduct or incidents of harassment, discrimination, or retaliation must immediately advise the HR Department.

You also should be aware that the Federal Equal Employment Opportunity Commission and the California Department of Fair Employment and Housing investigate and prosecute complaints of prohibited harassment, discrimination, and retaliation in employment. If you think you have been harassed or discriminated against or that you have been retaliated

against for resisting, complaining, or participating in an investigation, you may file a complaint with the appropriate agency. The nearest office can be found by visiting the agency websites at [www.dfeh.ca.gov](http://www.dfeh.ca.gov) and [www.eeoc.gov](http://www.eeoc.gov).

Supervisors and the HR Department must refer to all complaints involving harassment, discrimination, retaliation, or other prohibited conduct to the Chief Executive Officer or Chief Operations Officer so the Company can try to resolve the complaint.

When the Company receives allegations of misconduct, it will immediately undertake a fair, timely, thorough, and objective investigation of the allegations in accordance with all legal requirements and that provides all party's appropriate due process. The Company will reach reasonable conclusions based on the evidence collected.

The Company will maintain confidentiality to the extent possible. However, the Company cannot promise complete confidentiality. The Company's duty to investigate and take corrective action may require the disclosure of information to individuals with a need to know.

Complaints will be:

- Responded to in a timely manner.
- Kept confidential to the extent possible
- Investigated impartially by qualified personnel in a timely manner.
- Documented and tracked for reasonable progress.
- Given appropriate options for remedial action and resolution.
- Closed in a timely manner.

If the Company determines prohibited conduct has occurred, appropriate and effective corrective and remedial action will be taken in accordance with the circumstances involved. The Company also will take appropriate action to deter future misconduct.

Any employee determined by the Company to be responsible for harassment, discrimination, retaliation, or other prohibited conduct will be subject to appropriate disciplinary action, up to, and including termination. Employees should also know that if they engage in unlawful harassment, they can be held personally liable for the misconduct.

### **Diversity and Inclusion Policy**

At Saint John's Program for Real Change, a diverse, inclusive, and equitable workplace is one where all employees, clients, and volunteers, whatever their gender, race, ethnicity, national origin, age, sexual orientation or identity, education, or disability, feels valued and respected.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities, and talent that our employees invest in their work represents a significant part of our organization's success.

Only by embracing our clients' individuality and unique experiences can we encourage and assist in transformation and REAL CHANGE. Each employee, volunteer, and client have a unique story, needs, talents, motivation, and path to personal success.

Saint John's commitment to diversity, equity and inclusion is reflected in all our human resource practices and policies. We promote community outreach to ensure those we serve reflect the scope of the homeless population in our region and our services are shaped by diverse stakeholder input.

All Saint John's employees are responsible for treating others with dignity and respect. We pursue cultural competency throughout our organization by creating substantive learning opportunities, including training on providing trauma-responsive and individuated care. We ensure that all voices are valued and heard.

Diversity and inclusion are sponsored at the highest levels in the organization and recognized as a critical component of client and organizational success, with every level of the organization holding responsibility. Employees strive for awareness of their own unconscious and conscious bias and to ensure this does not manifest itself at work or in the service of our clients.

We strive to create an inclusive environment which embraces difference and fosters inclusion.

## Roles/Responsibilities/Delegations

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<b>ROLE</b>	<b>RESPONSIBILITY</b>
Human Resources & Chief Operations Officer	Policy update as needed

## Definitions

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<b>TERM</b>	<b>DEFINITION</b>
Retaliation	Retaliation in the workplace occurs when an employer or company leader takes negative action against an individual who files a formal complaint about discrimination or harassment. It can include any negative job action, such as demotion, discipline, firing, salary reduction, or job or shift reassignment. The Equal Employment Opportunity Commission (EEOC) considers the act of filing a complaint a "protected activity."

## Related Policies or Documents

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Employee Handbook pgs. 6-9

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All Departments