



## **POLICY AND PROCEDURES FOR RESPONDING TO DISCRIMINATION COMPLAINTS (EMPLOYEES AND COVERED INDIVIDUALS)**

### **I. PURPOSE**

The purpose of this policy is to inform directors, volunteers, agents, consultants, and employees as to Bridges Oregon's expectation and desire to create and maintain an environment free from all forms of discrimination and harassment, and, to encourage directors, volunteers, agents, consultants, and employees to come forward with credible information on potential violations of this policy. This policy applies to Bridges Oregon's directors, committee members, volunteers, agents, consultants, and employees (collectively "Covered Individuals").

### **II. POLICY**

Covered Individuals should be able to work or otherwise participate in Bridges Oregon's environment free from all forms of discrimination and harassment. For the purposes of this policy, "discrimination" refers to the unjust or prejudicial treatment of people on the basis actual or perceived sex, gender or gender identity, race, religion, creed, color, age, national origin, ancestry, marital status, veteran status, disability, sexual orientation or any other status protected under applicable federal, state, or local law. "Harassment" covers a wide range of behaviors of an offensive nature which demeans, humiliates, or embarrasses a person, and it is characteristically identified by its inappropriateness in terms of social and moral reasonableness.

Bridges Oregon will not tolerate discrimination and/or harassment of any individual because of that person's actual or perceived sex, gender or gender identity, race, religion, creed, color, age, national origin, ancestry, marital status, veteran status, disability, sexual orientation or any other status protected under applicable federal, state, or local law. Bridges Oregon will make this policy available on its website and in its policy manual for Covered Individuals to review as necessary. In the event a Covered Individual alleges a violation of this policy, Bridges Oregon shall adhere to the Complaint Procedures of this policy.

### **III. COMPLAINT PROCEDURES**

1. Complaints of discrimination and/or harassment from Covered Individuals in any form should immediately be reported to the ED and/or Board. If the complaint is against the ED, it should be directed to the Board. Complaints may be directed to the ED at [chad@bridgesoregon.org](mailto:chad@bridgesoregon.org) or to the President of the Board. Such



complaints should include the name of the complainant, the name and/or position of the purported violator of this policy, the complainant's contact information, the date and time of the incident, as well as the nature of the incident. Failure to report discrimination and/or harassment may result in the discrimination and/or harassment continuing and may render Bridges Oregon unable to correct the problem.

2. The ED and/or the Board (as appropriate) will promptly investigate all complaints of discrimination and/or harassment to the extent possible based on the information available. While the complaint and any information gathered in an investigation is considered company-confidential information, the investigation may require disclosure of the identity of those connected to the complaint or of information which could lead to the identification of persons connected to the complaint. To protect persons who complain of or witness discrimination and/or harassment from reprisals, the ED and/or the Board (as appropriate) will impose immediate and appropriate discipline on any Covered Individual who retaliates against another for submitting a complaint or providing information during the investigation of a complaint.
3. The ED will take corrective action when an employee, volunteer, agent, or consultant, is determined to have violated this policy. The Board shall take corrective action when a director, officer (including the ED) or committee member is determined to have violated this policy. Depending on the nature and severity of the violation, violation of this Policy by an employee of Bridges Oregon may result in disciplinary action, up to and including termination of employment. Violations by directors, committee members or volunteers, may lead to dismissal from the board, committee, or other volunteer placement. Violations by agents or consultants may lead to the termination of engagement with Bridges Oregon. Bridges Oregon reserves the right to take legal action against Covered Individuals who engage in prohibited or unlawful conduct with regard to this Policy.
4. Bridges Oregon may not require or coerce an employee to enter into a nondisclosure or non-disparagement agreement, or an agreement that requires the employee to maintain confidentiality with respect to complaints of discrimination or sexual harassment or assault. An aggrieved employee may, however, voluntarily request to enter into such an agreement. If an aggrieved employee does wish to voluntarily enter such an agreement, that employee will have seven days to revoke the agreement.
5. All employees have the right to contact the Civil Rights Division, Oregon Bureau of Labor and Industries and/or the Equal Employment Opportunity Commission with any complaint of unlawful discrimination and/or harassment. Employees may obtain information from the President/CEO.



6. All non-employees participating in Bridges Oregon's operations have the right to contact the Office for Civil Rights (OCR) by telephone at (800) 368-1019 or TDD: (800) 537-7697, and by email at [ocrmail@hhs.gov](mailto:ocrmail@hhs.gov) with any complaint of unlawful discrimination and/or harassment.

#### IV. TRAINING

Bridges Oregon will conduct seminars on the harassment and discrimination policies and reporting and enforcement procedures, reminding Covered Individuals of what constitutes discrimination and harassment, as well as what happens if there is a violation of Bridges Oregon's policies. At such seminars, Bridges Oregon will distribute these policies and encourage reporting of incidents involving discrimination or harassment, and answer any questions posed by Covered Individuals regarding discrimination, harassment, and Bridges' Oregon's relevant policies and procedures.