PROHIBITION OF HARASSMENT POLICY

Prohibition of Harassment

The Right Step, Inc. (hereinafter, “TRS”) forbids harassment, discrimination and retaliation based on race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, pregnancy, genetic information, marital status, sex, gender, gender identity, gender expression, age, sexual orientation, or military and veteran status or any other basis protected by federal, state or local law. TRS forbids harassment by any employee or volunteer of the TRS, including instructors, board members, and staff. This policy also applies to the conduct and behavior of volunteers, vendors, independent contractors and other persons with whom you may come in contact with while working, volunteering or participating in lessons. Harassment, including sexual harassment, of any client, employee, partner, applicant, intern, volunteer, contractor, temporary employee, or independent contractor will not be tolerated.

Prohibited harassment includes such conduct as slurs, jokes, intimidation and other verbal or physical conduct directed toward an individual based on any of the protected characteristics referenced above.

Specific Prohibition of Sexual Harassment

Although all forms of prohibited harassment are serious, special rules and standards have developed regarding sexual harassment that merit careful attention.

- Sexual harassment includes, but is not limited to:
- Verbal harassment such as epithets, lewd remarks, suggestive comments, derogatory jokes or comments, slurs or unwanted sexual advances, invitation, posts, comments or messages;
- Physical harassment such as assault, unwanted touching, intentionally imped ing or blocking movement, or any physical interference with normal work or movement with work because of sex;
- Visual forms of harassment such as derogatory and/or sexually-oriented posters, calendars, cartoons, drawings, screensavers, pictures or gestures;
- Communication via electronic media of any type that includes any conduct that is prohibited by state and/or federal law or by TRS policy; and
- Unwelcome sexual advances or threats of reprisals after a negative response to sexual advances, requests for sexual favors, or offers of employment or other work-related benefits in exchange for sexual favors:
  - If submission to such conduct is made a term or condition of work;
  - If submission to or rejection of such conduct is the basis for employment decisions; or
If such conduct unreasonably interferes with the individual’s work performance or has the purpose or effect of creating an intimidating, hostile or offensive work environment.

Sexual harassment need not be motivated by sexual desire to be unlawful or to violate this policy. For example, hostile acts toward another employee based on their gender or any other protected category can be considered sexual harassment.

**Reporting Harassment**

Maintaining a harassment-free workplace requires the attention and involvement of every person in TRS. If you believe you are the victim of harassment or you have witnessed harassment of another individual, immediately report the incident to your supervisor. In addition to or instead of your immediate supervisor, you may report harassment to any of the following individuals:

Christine Remy: boardchair@therightstepinc.org or 720-893-0650

Emily Stibbards: programdirector@therightstepinc.org or 720-893-0650

You are not required to confront the person who you believe has acted in violation of this policy before reporting the conduct or behavior to TRS.

All reports involving harassment or retaliation or other prohibited conduct must be referred to Christine Remy or Emily Stibbards so TRS may investigate and address the report.

Once reported, Christine Remy or Emily Stibbards will immediately determine who will conduct a fair, timely, thorough and objective investigation in accordance with all legal requirements. TRS will reach reasonable conclusions based on the evidence collected according all parties appropriate due process. Oral complaints will be reduced to writing to facilitate investigation. To the greatest extent possible, complaints will be: (1) responded to in a timely manner, (2) kept confidential to the extent possible, (3) investigated impartially in a timely fashion, (4) documented and tracked for reasonable progress, (5) given appropriate options for remedial action, and (6) resolved and closed in a timely fashion. There will be no retaliation for making a good faith report or otherwise participating in an investigation in good faith. Any TRS employee, partner, intern, volunteer, client, temporary employee or independent contractor who believes that he or she has been subjected to adverse employment or other action because of complying with this policy or making a report as described above should report that belief immediately just as they would report any other act of harassment.

If after an investigation TRS finds that any individual has violated this policy, prompt corrective action will be taken that may subject the individual to disciplinary action, up to and including removal from his/her position with TRS.
ACKNOWLEDGMENT OF RECEIPT OF

THE PROHIBITION OF HARASSMENT POLICY

I, __________________________, have reviewed a copy of The Right Step, Inc.’s ( “TRS’s) Prohibition of Harassment Policy. I have been advised to study this policy at my earliest convenience as it outlines policies and procedures of TRS. I understand, accept and agree to the terms as contained in this policy. I understand that TRS may have other policies and procedures in addition to the policies written herein and that TRS reserves the right to amend, change or terminate policies or benefits at its sole discretion with or without notice.

I understand that failure to comply with the provisions of this policy will be grounds for disciplinary action up to and including termination.

____________________________________ Date

____________________________________ Employee/Volunteer Name

____________________________________ Signature