

Sexual and Other Harassment		COO Approval Date	
		COO Signature	
		BOARD Approval Date	
Author	Grace Austin	CEO Approval Date	
Owner	Grace Austin	CEO Signature	
Owner-Title/Dept	Head of Finance & Administration	Version #	First Read 1.29.20
Regulatory Compliance	Title VII of the Civil Rights Act of 1964 and the Connecticut Fair Employment Practices Act	Regulation #	

Scope/Applicability

Health Information Alliance, Inc. is committed to providing a work environment that is free from sexual and other harassment, as well as a process for investigating allegations and correcting violations of policy and law.

This policy applies to all employees, contracted employees, volunteers and interns.

Definitions

Sexual Harassment - Sexual harassment means any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when:

- i. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- ii. Submissions to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
- iii. 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.

Sexually harassing conduct includes, but is not limited to:

- i. Verbal conduct, such as suggestive or offensive comments, lewd remarks, or sexual propositions;
- ii. Non-verbal conduct, such as derogatory or pornographic displays, displays of

computer/Internet pornography, cartoons or drawings, sexual gestures, leers or stares;

- iii. Physical conduct, such as touching, kissing, patting, brushing up against someone, or assault.

Policy Statements

Sexual and Other Harassment is illegal and violates HIA, Inc.'s Code of Conduct policy: Sexual and other harassment of HIA, Inc. employees is prohibited by Title VII of the Civil Rights Act of 1964 and the Connecticut Fair Employment Practices Act. Together, federal and state law prohibit harassment based on an individual's race, color, religion, age, sex, sexual orientation, gender identity or expression, marital status, national origin, ancestry, past or present history of mental disorder, mental retardation, learning ability or physical disability, including but not limited to blindness. HIA, Inc. prohibits harassment based on protected class status, as described above, plus civil union status, sexual identity, and veteran status.

Employee Response to Harassment: HIA, Inc. encourages employees to use the Open Door Policy to file complaints when they believe they have been sexually harassed (see Open Door Policy). Employees who believe that they have been harassed in any manner immediately contact their supervisor, manager, or a Human Resources representative. All complaints of sexual and/or other harassment are treated with confidentiality. HIA, Inc. does not tolerate any retaliation against any complaining employee or witness.

Supervisor Responsibility: Any manager or supervisor who is aware of possible sexual and/or other harassment must immediately notify Human Resources.

Investigation: When Human Resources is made aware of a complaint of harassment, an investigation is immediately initiated, which includes interviewing the subject(s), complainant(s), and any potential witnesses. If it is determined that harassment has occurred, appropriate disciplinary action will be taken, up to and including termination (see Discipline and Termination Policy).

Legal Action: In addition to resolving the employee's harassment complaint internally with HIA, Inc., the employee may also elect to initiate legal action. Federal and state laws include a variety of remedies, which may include cease and desist orders, back pay, compensatory damages, hiring, promotion, or reinstatement. Harassers may be subject to civil or criminal penalties. Federal and Connecticut state law requires that a formal written complaint be filed with the Equal Employment Opportunities Commission and/or the Connecticut Commission on Human Rights and Opportunities, respectively, within 180 days of the date when the alleged sexual and/or other harassment occurred.

Reporting: Employees having knowledge of a violation of this policy are required to immediately report the information to their supervisor, manager, or Human Resources representative. Employees may report knowledge of a violation anonymously to their

supervisor, manager, or Human Resources representative. HIA, Inc. does not tolerate any retaliation against any employee for disclosing a violation.

Evaluation/Review

The overall performance of the organization in meeting the objectives of this policy is assessed annually by the Chief Financial Officer in conjunction with legal. The evaluation consists of review of this policy annually, revising and updating as needed.

