



## **PRIORY POLICIES AND PROCEDURES**

### **Harassment**

The Priory will not tolerate any form of unlawful harassment. The Priory's harassment policy (the "Harassment Policy") applies not only to employees, but also to temporary staff and volunteers, vendors, consultants, community representatives, Members and others associated with the Priory ("Covered Persons"). All Covered Persons are expected to cooperate fully in implementing the Harassment Policy. Any Covered Person found to have violated the Harassment Policy is subject to disciplinary action, up to and including termination of their relationship with the Priory.

From time to time, the Priory offers its members the opportunity to volunteer with charitable organizations in the United States and abroad, including, but not limited to, through partnerships established and maintained by the St John Volunteer Corps. During these charitable activities, Covered Persons may come into contact with children or vulnerable adults, such as elderly or disabled adults who require care and support, who are unable or less able to protect themselves and are therefore at a heightened risk of abuse, sexual exploitation, injury, or other harm. Thus, it is of paramount importance that vulnerable individuals who receive volunteer services from Covered Persons are also provided safe environments free from all forms of harassment or abuse. If a Covered Person is subjected to any conduct believed to violate any of the policies described herein or is a witness of any such conduct, the possible violation should be promptly reported pursuant to the reporting procedure below ("Reporting Procedures"). This Harassment Policy will be reviewed by the Priory Chapter periodically and amended as needed to comply with all federal, state, and local laws.

#### **a. Sexual Harassment**

The Priory has a zero-tolerance position against sexual harassment. Sexual harassment includes unwelcome or unsolicited verbal, physical or sexual conduct that is made a term or condition of employment or volunteer service, or is used as the basis of selection for employment or advancement decisions. Sexual harassment also includes conduct that has the purpose or effect of unreasonably interfering with volunteer activities or creating an intimidating, hostile or offensive environment.

Sexual harassment may include a range of subtle and not so subtle behaviors and may involve individuals of the same or different sex. The Priory prohibits any inappropriate or offensive behavior including, but not limited to:

- ❖ Coerced sexual acts;
- ❖ Express or implied threats or demands for sexual favors in exchange for favorable reviews, assignments, promotions, continued employment or promises of continued employment;
- ❖ Touching or assaulting an individual's body;
- ❖ Leering or catcalls;
- ❖ Graphic verbal commentary about an individual's body or sexuality;
- ❖ Unwelcome or offensive sexual jokes, sexual language, sexual epithets, sexual gossip, sexual inquiries;
- ❖ Unwelcome flirtations, advances, or propositions;
- ❖ Sexually suggestive or obscene comments or gestures;
- ❖ Displaying or circulating graphic or sexually suggestive objects, pictures or graffiti in the workplace (including through email); and
- ❖ Negative or disparaging comments.

**b. Harassment Based on other Protected Characteristics**

The Priory provides an environment in which all Covered Persons, and persons in the communities they serve, are treated with courtesy, dignity and respect. Under the Harassment Policy, all Covered Persons have the right to work and volunteer in an environment free from harassment based upon their race, color, religion, national origin, sex, age, marital status, personal appearance, sexual orientation, gender identity or expression, family responsibilities, genetic information, disability, matriculation or political affiliation.

Harassment in any form, including but not limited to verbal and physical harassment, is strictly prohibited. Examples of other prohibited conduct include:

- ❖ Epithets, slurs, quips, or negative stereotyping or remarks threatening, intimidating or hostile acts that relate to race, color, religion, sex, national origin, sexual orientation, gender identity, age, disability, veteran status, alienage or citizenship status, marital status or any other category protected by federal or local law;
- ❖ Written or graphic material (including graffiti) that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, sex, national origin, sexual orientation, gender identity, age, disability, veteran status, alienage or citizenship status, marital status or any other protected category and that is distributed and attributed to the Priory, including by email or social media;
- ❖ Physical conduct, including but not limited to assault, unwanted touching, blocking or interfering with normal movement or work;
- ❖ Retaliation for having reported or threatened to report harassment or for cooperating with the investigation of harassment; and
- ❖ Any other basis protected by applicable law.

**c. Safeguarding Obligation**

In addition to the policies stated above, Covered Persons who participate in or help facilitate charitable activities through the Priory's partnership with other organizations must abide by the following policies and procedures:

- ❖ Should a Covered Person become aware that another Covered Person has engaged in any form of harassment prohibited by this Harassment Policy, the Covered Person should immediately

report the suspected misconduct in the manner prescribed by the Priory outlined in the Reporting Procedures.

- ❖ Should a Covered Person become aware that someone unaffiliated with the Priory has engaged in any form of misconduct prohibited by this Policy or law during an event hosted by another organization, the Covered Person should immediately report his or her concerns to a member of the organization who appears best suited to address the reported misconduct. The Covered Person should also inform the Priory, in accordance with the Reporting procedures below, that they reported the misconduct to the organization and describe the nature of the misconduct that they witnessed. If the Covered Person, in his or her best judgment, determines that it would be inappropriate or potentially harmful to report suspected misconduct to the partnered charitable organization, then the Covered Person should report the suspected misconduct directly to the Priory consistent with the Reporting Procedures.
- ❖ Additionally, children and vulnerable adults who Covered Persons serve during the course of these charitable activities may report that they have suffered harassment or abuse from persons who are unaffiliated with either the Priory or the charitable organization with which the Priory has partnered. If a recipient of services shares concerns regarding harassment or abuse with a Covered Person, the Priory encourages the Covered Person to listen to and acknowledge their concerns in a calm and comforting manner. Covered Persons in such a situation should not ask for further details from the person reporting such harassment or abuse. After the conversation, the Covered Person should report the conversation to a leader associated with the hosting charitable organization, and the Covered Person should also report the suspected misconduct directly to the Priory consistent with the Reporting Procedures.

#### **d. Reporting Procedures**

The Priory is committed to responding to complaints of inappropriate or unprofessional behavior, and to investigate thoroughly and remedy immediately any known incidence of unlawful discrimination or harassment. To accomplish this policy, any employee or other Covered Person who has experienced, observed, or otherwise become aware of language or conduct which may be in violation of this policy is urged to promptly bring the matter to the attention of their direct supervisor or to the Executive Director. Those holding a supervisory position who become aware of any such language or conduct are required to report immediately to the Executive Director so the Priory can promptly investigate the matter and take appropriate action. All complaints will be taken seriously and thoroughly investigated. If an employee or Covered Person is found to have violated any provision in this Harassment Policy, such person will be subject to disciplinary action up to and including immediate termination of their relationship with the Priory. When the Priory determines it to be appropriate, law enforcement may be notified.

The Priory will endeavor to protect the privacy of both the complainant and the alleged wrongdoer and to keep the investigation confidential to the extent practical and appropriate under the circumstances.

#### **e. Protection against Retaliation**

The Priory prohibits any form of retaliation against an employee for filing a harassment and/or discrimination complaint or for expressing concern that the Priory non-discrimination and anti-harassment policies have been violated. Retaliation is a serious violation, and an employee who

feels that he or she has been subjected to an act of retaliation by the Priory should immediately report such conduct to his or her supervisor and/or the Executive Director.