

CRCNA POLICIES

Violence in the Workplace

Violence in any form (physical, sexual, emotional, etc.) harms people, destroys trust, erodes the integrity of a person, and is contrary to God's intentions for human relationships. Accordingly, the CRCNA has adopted a policy of zero tolerance for any threatening, intimidating, harassing, abusive, or coercive behavior, whether overt or implied, as well as any improper, harmful, or offensive physical contact initiated by an employee.

We likewise prohibit the possession/use of firearms, knives, or other weapons on our time or property, including weapons that may be stored in any vehicles that come onto our property. This policy also applies at all times and in all places when an employee is on CRCNA business. This policy applies whether or not the person is licensed to carry the weapon, concealed or otherwise.

Any employee who witnesses any conduct from a co-worker, business partner, or visitor that violates this policy shall immediately advise the agency or department director. Any employee who violates this policy will be subject to immediate discipline, up to and including discharge.

International staff should see the Crisis Management policy for further information related to safety.

When international staff are working in the U.S. and/or Canadian Offices the policy aspects below will also apply:

Occupational Health and Safety Act Protections

Workplace Violence

The Occupational Health and Safety Act in Canada defines workplace violence as the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker. It also includes an:

- attempt to exercise physical force against a worker in a workplace, that could cause physical injury to the worker; and a
- statement or behavior that a worker could reasonably interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.

This definition of workplace violence is broad enough to include acts that would constitute offences under Canada's *Criminal Code*.

Examples of workplace violence include:

- verbally threatening to attack a worker;
- leaving threatening notes or sending threatening e-mails to a worker;
- shaking a fist in a worker's face;
- wielding a weapon at work;
- hitting or trying to hit a worker;
- throwing an object at a worker;
- sexual violence against a worker; or
- kicking an object the worker is standing on, such as a ladder.

Domestic Violence

A person who has a personal relationship with a worker – such as a spouse or former spouse, current or former intimate partner or a family member – may physically harm, or attempt or threaten to physically harm, that worker at work. In these situations domestic violence is considered to be workplace violence.

Application of this Policy

CRCNA takes the position that violent behaviour in the workplace is unacceptable from anyone.

This policy applies to all those working for CRCNA including all employees, volunteers, board members, and visitors. CRCNA will not tolerate workplace violence whether engaged in by fellow employees, volunteers, board members or visitors or anyone else entering the workplace. Everyone is expected to uphold this policy and to work together to prevent workplace violence.

Obligation to Report

Every employee and volunteer at CRCNA has an obligation to immediately report incidents of workplace violence or a belief that workplace violence is likely to occur. This obligation is not limited to the direct victim of workplace violence.

All reports of workplace violence or aggressive behavior will be treated seriously, will be investigated thoroughly and fairly, and will be dealt with accordingly.

Failure to report workplace violence may result in disciplinary measures up to and including immediate termination without notice.

Anyone who is the victim of workplace violence or who witnesses workplace violence may, at their option, contact the police directly.

Emergencies / Urgent Situations

In the event that workplace violence has taken place, is taking place or is imminent and there is injury or is likely to be injury the following steps are to be taken immediately:
refer to CRCNA Emergency Response Procedure if necessary;

- facilitation of medical attention (if injury has occurred);
- report to police (as required); and

- complete incident report, report to the Human Resources Department if a critical injury or fatality has occurred.
- In the event that workplace violence has taken place (where the worker is not injured or is able to remain at work because of the nature of his or her injuries) or where workplace violence is likely to endanger a worker, the worker shall remain in a safe place and available for investigation.

Reporting Process

Imminent Threat or Workplace Violence

In a situation where there is an imminent threat that workplace violence will occur or if workplace violence is taking place it must be verbally reported to any management personnel of CRCNA without delay.

In such situations, CRCNA will immediately take all reasonable steps to prevent workplace violence from occurring or to stop workplace violence which is occurring. After all immediate steps have been taken, formal reporting of the situation will be made.

Formal Reporting Process

The formal reporting process shall be commenced in any of the following circumstances: After all steps have been taken to prevent imminent workplace violence or to stop workplace violence from occurring.

- When a worker has suffered workplace violence.
- When a worker has witnessed workplace violence.
- When a worker becomes aware of the threat of workplace violence taking place.
- When CRCNA becomes aware of unreported workplace violence or the threat of workplace violence.

The initial step in the formal reporting process is the making of a written report. The written report must be made using the approved incident form and delivered to your supervisor or director and the Human Resources Department. Incidents involving a Director may be reported to the Executive Director.

If a verbal report has been made in a situation where there was an imminent threat that workplace violence will occur or if workplace violence was taking place, the initial report will be prepared by the management personnel who received the verbal report.

If CRCNA becomes aware of unreported workplace violence or the threat of workplace violence the initial report will be prepared by the agency Director, the Executive Director or their designate.

The report should include:

- the approximate date and time of the incident/s or threat;
- the name of the person or persons involved in the incident/s or threat;

- the name of any person or persons who witnessed the incident/s or threat;
- the steps that have already been taken in respect of the incident/s or threat; and
- a full description of what occurred in the incident/s or what lead the reporter to believe there was a threat.

Written reports must contain a statement that the reporter and/or details of the report may be provided to the persons involved. Written reports must also contain a statement that the information contained in the complaint is true and complete.

Investigation

Investigations will be commenced once a report has been made. Investigations will generally follow the process outlined below. However, CRCNA reserves the right to vary the following procedure depending on the nature of the incident/s in question.

Investigations will be carried out by an agency Director, the Executive Director or their designate. Investigations should not be carried out by the direct supervisor of the parties involved in the incident/s. Depending on the circumstances reported, CRCNA may engage the services of an outside investigator. Investigations will generally include:

- inform the accused individual of the report;
- interview the person making the report, any person involved in the incident and any witnesses named (generally, the person/s accused will be given an opportunity to understand the nature of the report prior to being interviewed);
- interview any other person who may have knowledge of the incidents reported or any other similar incidents;
- detailed written statements from persons being interviewed will be taken. Written statements shall be signed and include a statement that the information contained in the statement is true and complete ; and
- a written report outlining the investigator's conclusions. Written reports outlining the investigator's conclusions will be kept by Human Resources for a period of no less than 5 years.

Management personnel must cooperate with each other in order to facilitate an investigation.

Disciplinary Measures

If it is determined by CRCNA that any employee has been involved in workplace violence or the threat of workplace violence, immediate disciplinary action will be taken. Such disciplinary action will involve, at a minimum, a formal warning but **may result in immediate dismissal without further notice.**

It is important to realize that unfounded allegations of workplace violence or the threat of workplace violence may cause both the accused person and CRCNA significant damage. If it is determined by CRCNA that any worker has knowingly made false statements regarding an allegation of workplace violence immediate disciplinary action will be taken. As with any case of dishonesty, **disciplinary action may include immediate dismissal without further notice.**

If it is determined that a client is guilty of workplace violence or the threat of workplace violence, he or she may be banned from CRCNA property.

Confidentiality

All reports or evidence regarding workplace violence or the threat of workplace violence will be kept in strict confidence, except as follows:

- disclosure of the information may be necessary to investigate the allegations;
- disclosure of the information may be necessary to respond to any legal or administrative proceedings arising out of or relating to the report;
- disclosure of the information may be necessary in order to comply with the duty to inform workers of health and safety risks; or
- disclosure of the information may be required by operation of the law.

Policy Review

CRCNA will review this policy on an annual basis.

Risk Assessments

For concerns raised in Canada, the Joint Health and Safety Committees will conduct a risk assessment for all workplace violence hazards within the CRCNA office. The risk assessment will be reviewed and recommendations made to management. Reassessments of the risks of workplace violence hazards will be conducted as often as necessary to ensure that this policy and program continue to protect workers from workplace violence.

Training / Orientation

All new employees will receive training and orientation with respect to this Workplace Violence Policy.

Abuse Prevention and Reporting

Field and/or country leaders should formulate abuse prevention policies for their area, and review the policies with employees on a regular basis. These policies should take into account country laws as applicable.

Any employee who becomes aware of allegations of physical or sexual violence perpetrated by an employee, a member of the employee's immediate family, or a national staff member against a minor on or off the field shall immediately advise the agency director. For the purposes of this policy, all agency directors are mandated reporters, and therefore the director shall notify the proper authorities within 24 hours. A report must also be made to the Director of Human Resources, the Executive Director and Canadian Ministries Director in the case of an employee on the Canadian payroll.

Investigation

The field leader or country leader, in consultation with the appropriate legal authorities when required by host country law, will be responsible for assuring that an appropriate investigation is

conducted. Where the field leader or country leader is the alleged perpetrator, the responsibility of investigation will rest with the program director or ministry team leader.

In cases of sexual abuse allegations and serious allegations of emotional abuse, the abuser should be separated from the minor until the investigation is completed. This is to assure that the minor is protected and that the alleged perpetrator does not have access to the minor to influence his or her testimony.

The field leader or country leader shall consult with the agency director, the Director of Human Resources, and others, as deemed necessary, to determine an appropriate action plan. Upon the conclusion of the investigation, the field leader or country leader will prepare and submit a copy of a written report to the program director or ministry team leader, the agency director, the Director of Human Resources, the Executive Director, and the Director of Canadian Ministries if it is a Canadian employee.

Note: Field leader/team leaders or country leaders are responsible to become familiar with their respective host country laws governing the protection of minors.

Discrimination and Harassment Policy

The Christian Reformed Church in North America (CRCNA) is committed to providing a work environment that ensures every employee is treated with dignity and respect and afforded equitable treatment.

The CRCNA will not tolerate conduct that violates employees' dignity and respect. The CRCNA also strives to create an equitable work environment.

All employees are responsible for encouraging an atmosphere of mutual respect and for preventing and discouraging harassment and abuse from taking place.

(Note: Reference to the Human Rights Code and the Occupational Health and Safety Act are based on specific Canadian legislation, yet the particulars of this policy apply for all employees).

Human Rights Code Protections

Discrimination

The Human Rights Code provides that every person has a right to equal treatment with respect to employment without discrimination because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, record of offences, marital status, family status, or disability.

The CRCNA is a Christian organization primarily engaged in serving the interests of Christians who wish to carry out their Christian ministry. As such, the right to equal treatment without

discrimination is limited only to the extent that discrimination in employment is reasonable and bona fide because of the nature of employment with the CRCNA.

Harassment

The right to equal treatment in employment includes the right to be free from harassment in the workplace by the employer or agent of the employer or by another employee because of race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, age, record of offences, marital status, family status, or disability.

Harassment in this context is defined as engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome.

Such harassment includes but is not limited to threats, intimidation, displays of racism, sexism, unnecessary physical contact, suggestive remarks or gestures, offensive pictures or jokes. Undirected harassment can also occur. This is the display of offensive materials or graffiti and the use of language including the types of remarks referred to above, but with no specific person being the target of the materials or the comments.

Sexual Harassment

Sexual harassment may be one or a series of incidents involving unsolicited and unwelcome sexual advances, requests for sexual favours, or other verbal or physical conduct of a sexual nature.

As defined by U.S. and Canadian law, "sexual harassment" means any unwelcome sexual advances or requests for sexual favours or any other verbal or physical conduct of a sexual nature that the perpetrator knows or ought to know is unwelcome. Sexual harassment occurs when: (1) submission to such advances, requests, or conduct is made either implicitly or explicitly a term or condition of an individual's employment; (2) submission to or rejection of such advances, requests, or conduct by an individual is used as the basis for employment decisions affecting the individual; or (3) such advances, requests, or conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Sexual harassment includes unsolicited and unwelcome contact or behaviour of a sexual or gender-specific nature. Some examples of sexual harassment include unwelcome sexual flirtation, touching another employee in an offensive manner, and implicit or explicit requests for sexual acts or favours. Sexual harassment also includes continuing to express sexual or social interest in another employee after being told that the interest is unwelcome, graphic, or suggestive; comments about an individual's dress or body; verbal comments of a sexual nature; or sexually degrading words to describe an individual.

By its very nature sexual harassment is difficult to precisely define. It is therefore important to remember that sexual harassment may occur in very subtle ways. Simple gestures or body language may amount to sexual harassment if it is of a sexual nature.

Sexual Solicitation

Sexual solicitation is any verbal, written, or implied proposition or advance made by a person in a position to confer, grant, or deny a benefit or advancement to another person where the person in a position to confer, grant, or deny a benefit or advancement knows or ought reasonably to know that it is unwelcome.

Reprisal, as it relates to sexual solicitation, means any negative action or the threat of any negative action by a person in a position to confer, grant, or deny a benefit for the rejection of a sexual solicitation.

Occupational Health and Safety Act Protections

Workplace Harassment

In addition to the right to be free from harassment under the Human Rights Code, the Occupational Health and Safety Act defines workplace harassment as engaging in a course of vexatious comment or conduct against a worker in a workplace that is known or ought reasonably to be known to be unwelcome.

Workplace harassment may include but is not limited to threats, intimidation, displays of anger, yelling, shunning, unnecessary physical contact, suggestive remarks or gestures, offensive pictures or jokes. Undirected workplace harassment can also occur. This is the display of offensive materials or graffiti and the use of language including the types of remarks referred to above, but with no specific person being the target of the materials or the comments.

Workplace harassment also includes bullying. Bullying is repeated and persistent negative acts towards one or more individuals that involve a perceived power imbalance and create a hostile work environment.

Workplace harassment does not include the exercise of normal managerial functions such as the giving of workplace direction, constructive criticism, corrective actions, or discipline in appropriate cases.

Application of This Policy

This policy applies to all those working for the CRCNA, including employees, volunteers, board members, and visitors. The CRCNA will not tolerate discrimination or harassment whether engaged in by fellow employees, volunteers, board members, or visitors of the CRCNA. The CRCNA will not tolerate sexual solicitation as defined under the Human Rights Code.

Complaint Process

The complaint process may be initiated in any of the following circumstances:

- If you believe you have been discriminated against or harassed or are the object of an unwelcomed sexual solicitation.
- If you believe you have witnessed discrimination, harassment, or sexual solicitation.
- If CRCNA management believes that discrimination or harassment has taken place.

In any of these circumstances, the complaint process may be initiated by resolving the situation informally or through the formal procedure.

Note: You may choose not to exercise the Informal Procedure if you are not comfortable with it.

Informal Procedure

The informal procedure may be commenced in one of two ways:

- Confront the individual personally or in writing, pointing out the unwelcome behaviour and requesting that it stop.
- Discuss the situation with the individual's supervisor or director, or discuss the situation with your supervisor or director.

If the individual is not confronted in writing or if the situation is discussed with a supervisor or director, it is always advisable to keep records of the discussions and to confirm the discussion in writing (email is preferable).

If you are asked by a coworker to stop a behaviour which they consider unwelcomed, you should assess your behaviour carefully. Even if you did not intend to offend, your behaviour has been perceived that way, and you should change your conduct. An apology to the offended person may also be appropriate. Failure to change your conduct may expose you to investigation and disciplinary measures. If you believe the concerns of your co-worker are unfounded or made in bad faith, you should report this to your supervisor or director, who will make a record of your report. This person may assist in analyzing your conduct. You should keep a record of your recollection of any incidents that may have been taken as offensive.

Formal Procedure

The formal procedure is commenced by making a written complaint. The written complaint must be made using the approved incident form and delivered to the Director of Human Resources and to the individual's supervisor or director, or delivered to your supervisor or director. Incidents involving a director may be reported to the executive director. The complaint should include the following:

- the approximate date and time of each incident reported
- the name of the person or persons involved in each incident
- the name of any person or persons who witnessed each incident
- the steps that have already been taken in respect of the complaint
- a full description of what occurred in each incident

Written complaints must contain a statement that the complaint and/or details of the complaint may be provided to the person complained about. Written complaints must also contain a statement that the information contained in the complaint is true and complete.

Investigation

Investigations will be commenced if the formal procedure is invoked or if discrimination, harassment, or sexual solicitation comes to the attention of the CRCNA. Investigations will generally follow the process outlined below. However, the CRCNA reserves the right to vary the following procedure depending on the nature of the incident/s in question.

Investigations will be carried out by a director, the executive director, or their designate. Investigations should not be carried out by the direct supervisor of the parties involved in the dispute. Depending on the circumstances complained about, the CRCNA may engage the services of an external investigator. Investigations will generally include the following:

- informing the accused individual of the complaint
- interviewing the person making the complaint, any person involved in the incident, and any witnesses named (generally, the person/s complained about will be given an opportunity to understand the nature of the complaint prior to being interviewed)
- interviewing any other person who may have knowledge of the incident/s complained about or any other similar incident/s
- detailed written, signed statements from persons being interviewed. Written statements shall be signed and include a statement that the information contained in the statement is true and complete.
- a written report outlining the investigator's conclusions. Written reports outlining the investigator's conclusions will be kept by Human Resources for a period of no less than seven years.

Management personnel must cooperate with each other in order to facilitate an investigation.

Disciplinary Measures

If it is determined by the CRCNA that any employee has been involved in discrimination against another employee, harassment of another employee, or sexual solicitation of another employee, immediate disciplinary action will be taken. Such disciplinary action will involve, at a minimum, a formal warning but **may result in immediate dismissal without further notice.**

It is important to realize that unfounded allegations of harassment may cause both the accused person and the CRCNA significant damage. If it is determined by the CRCNA that any employee has knowingly made false statements regarding an allegation of harassment or sexual solicitation, immediate disciplinary action will be taken. As with any case of dishonesty, **disciplinary action may include immediate dismissal without further notice.**

Confidentiality

All complaints, reports, or evidence regarding harassment or sexual solicitation will be kept in strict confidence, except as follows:

- Disclosure of the information may be necessary to investigate the allegations.
- Disclosure of the information may be necessary to respond to any legal or administrative proceedings arising out of or relating to the report.
- Disclosure of the information may be necessary to prosecute any legal or administrative proceedings arising out of or relating to the report.
- Disclosure of the information may be required by operation of the law.

Policy Review

The CRCNA will review this policy on an annual basis.

Training/Orientation

All new employees will receive training and orientation with respect to this Discrimination and Harassment Policy.

Abuse Prevention and Reporting Policy for the Agencies and Educational Institutions of the Christian Reformed Church

Respect and Human Dignity Policy

People are created in God's image. Our humanity encompasses many dimensions, including spiritual, physical, social, emotional, relational, and sexual. As individuals, we live and work in relationship to others. These relationships are guided and protected by boundaries set forth by God in the Holy Scriptures, as well as by boundaries set forth in public law, policies, and procedures. As an employer, the Christian Reformed Church (CRC) is responsible for upholding these boundaries to ensure that the work environment is free of offensive, unwarranted, unwanted, harassing, abusive, or violent behaviors and attitudes.

Just as image-bearing likeness to Christ extends beyond the space within which employees do their work, so too the boundaries that guide and protect individuals and relationships extend beyond the workplace. Employees of the CRC may not impair the reputation, activities, or purposes of the CRC, nor diminish the position to which the person was appointed, either within or outside of the workplace. No employee may show a willful disregard for the interests of the CRC or engage in conduct that reflects unfavorably upon the CRC as a church organization. Any unacceptable conduct will be subject to disciplinary action (section 705).

Discrimination and Harassment

The CRC is committed to providing a work environment that is free of discrimination and harassment. Inappropriate actions, words, jokes, or comments based on an individual's gender, race, ethnicity, age, religion, or any other legally protected class of persons, will not be tolerated. Protected classes are defined in the applicable federal, state, and provincial statutes. All harassment is demeaning to other persons and undermines the integrity of the employment

relationship. It is strictly prohibited. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitutes sexual harassment when

- submission to such conduct is made either explicitly or implicitly a term or condition of an employee's continued employment, or
- submission to or rejection of such conduct by an individual is used as a basis for employment decisions affecting the employee, or
- such conduct has the purpose or effect of interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

Each employee is expected to respect the integrity, dignity, and potential of every other employee. Any employee who experiences or becomes aware of an incident of discrimination or sexual or other harassment shall immediately report the matter to his or her supervisor. If the supervisor is unavailable, or if the employee believes it would be inappropriate to contact that person, the employee shall immediately contact the agency's director or the director of personnel. Employees can raise concerns and make reports without fear of reprisal.

Any supervisor who becomes aware of possible discrimination or harassment shall inform the agency director, who is responsible for handling the matter in a timely and confidential manner. All agencies are to report such incidents to the director of personnel and to the executive director of ministries (EDM) without delay.

If the person to whom a report is to be made is, or may be, guilty of harassment or of any other violation of this policy, the report may be made directly to the agency director, the director of personnel, or the EDM.

Anyone, including executive staff members of agencies, who engages in sexual or other harassment, or any other violation of this policy, including failure to comply with the reporting requirements, will be subject to disciplinary action (section 705). The EDM and the officers of the agency board involved will determine appropriate disciplinary measures for executive staff. Appropriate disciplinary measures for ordained staff will be determined by the agency director and the EDM in consultation with the church council holding the employee's credentials.

Violence

Violence in any form (physical, sexual, or emotional) harms people, destroys trust, erodes the integrity of a person, and is contrary to God's intentions for human relationships. This applies to conduct both within and outside of the workplace.

Violence against a minor (as defined by state or provincial law)

Any employee, supervisor, or manager who becomes aware of allegations of current[1] physical or sexual violence perpetrated by an employee against a minor shall immediately advise the agency director. For the purposes of this policy, all agency directors are mandated reporters[2], and therefore, the director shall notify the proper authorities within 24 hours. A report must also be made to the director of personnel and the EDM.

In Canada, any employee, supervisor, or manager who becomes aware of allegations of physical or sexual violence perpetrated by an employee against a minor shall immediately report the matter to the proper authorities. Furthermore, a report must be made to the agency director, who in turn shall inform the director of personnel and the Canadian ministries director (CMD).

Violence against an adult

Any employee, supervisor, or manager who becomes aware of allegations of current physical or sexual violence perpetrated by an employee against an adult shall immediately advise the agency director. The director will invoke steps of discipline depending on the severity of substantiated allegations. The director must report the allegations and the disposition of the matter to the director of personnel and the EDM. When allegations are directed at ordained staff or executive staff, the EDM will appoint a committee of not more than three who will interview the alleged complainant and the employee. Upon recommendation of the committee, the EDM, in consultation with the director of personnel and the church council holding the employee's credentials or the agency board, will proceed with steps of discipline (section 705).

Anyone who violates this policy, including the reporting requirements, will be subject to disciplinary action (section 705). Discipline of executive staff will be determined by the EDM in consultation with the agency board. Discipline of ordained staff will be determined by the agency director and the EDM, in consultation with the church council holding the employee's credentials.

Employees who engage in conduct described in this section (discrimination, harassment, or violence) that has or has not resulted in disciplinary action may benefit from rehabilitation, treatment programs, or additional training. The director of personnel will maintain recommended resources for rehabilitation, treatment, or training. Decisions regarding leave or time off will be made by the agency director in consultation with the director of personnel and the EDM (see also section 704).

International Staff

The Respect and Human Dignity policy also applies to all staff working and living outside of the United States and Canada. However, agencies with international staff face unique circumstances in implementing the policy:

- In many cases there is a significant physical distance between field staff and field directors.
- Working and living conditions can make the application of progressive discipline difficult to enforce.
- Supervision of field staff who are in violation of this policy can be difficult.

For these reasons, agencies with international staff will develop a written procedure for the investigation, maintenance of accountability, supervision, and disciplinary steps to be applied in

the event this policy is violated. The written plan is to be submitted to the EDM, who will, in consultation with the director of personnel and legal counsel, approve a plan for implementation.

705 Progressive Discipline

The intent of progressive discipline is to correct most employee problems at an early stage, benefiting both the employee and the employer. The purpose of any disciplinary action is to correct a problem, prevent recurrence, and prepare the employee for satisfactory service in the future. The progressive disciplinary policy of the CRC is based on good leadership and fair supervision at all employment levels. It is designed to ensure fair treatment of all employees and to make certain that disciplinary actions are prompt, uniform, and impartial.

Although employment is based on mutual consent and both the employee and the employer have the right to terminate employment at will (with or without cause or advance notice), management may use progressive discipline at its discretion.

Progressive disciplinary action may call for any of the following steps: (1) verbal warning, (2) written warning, (3) suspension with or without pay, and (4) termination of employment. The step(s) chosen depends on the severity of the problem and the number of occurrences. Circumstances may justify either an immediate suspension or, in extreme situations, immediate termination of employment, bypassing the usual progressive discipline steps.

While it is impossible to list every type of behavior that may be deemed a serious offense, the following are examples of actions or conduct that may trigger progressive discipline or immediate suspension or termination of employment. Employees terminated for misconduct are not eligible for continuation of benefits (see section 406.1):

- Excessive or unexcused tardiness and/or absenteeism
- Leaving one's job before completing duties
- Misuse of the telephone, computer, or other electronic media systems
- Excessive loitering with other employees
- Inappropriate dress and grooming
- Unsatisfactory job performance
- Falsifying employment application information
- Disrespect of customers, constituents, supervisors, or fellow employees
- Neglect or failure to perform assigned duties
- Malicious damage to property owned by the CRCNA, its employees, or guests
- Insubordination
- Theft or other dishonesty of any kind
- Drug or alcohol abuse
- Criminal activity
- Lying

- Profanity or abusive language
- Undermining morale among the staff
- Violation of the policies on respect and human dignity and violence (103), including sexual or other harassment; physical, sexual or emotional violence; failure to report any such harassment or violence
- Immoral or indecent conduct

The examples listed above are illustrative, not exhaustive. Other infractions may also result in discipline consistent with guidelines presented in this policy.

It is the responsibility of the supervisor to make the employee aware of the details that make his or her actions unacceptable. The employee should take the steps that are necessary to correct a shortcoming. If a violation is of a serious nature it should be brought to the attention of the agency director, the director of personnel, and/or the EDM. A means of corrective action will be determined by the ensuing discussion.

File: \\wp51\edm\Discrimination and Harassment Policy

[1] "Current," within the context of this policy, is defined as an event that took place within, but not limited to, approximately the previous twelve months.

[2] A mandated reporter is a person required by state or provincial law to report child abuse or neglect. In Ontario everyone who has reason to believe that a child has been or is likely to be abused is legally responsible to report. In Michigan various identified professional groups are mandated reporters. This list includes, but is not limited to, physicians, dentists, certified social workers, school counselors or teachers, law enforcement officers, childcare providers, and others who have reasonable cause to suspect child abuse or neglect. While ministers are not mandated reporters in Michigan, for the purposes of this policy they shall be considered mandated reporters, since in supervisory positions it is likely that the clergy-parishioner confidentiality provisions would not apply; ministers are mandated reporters by law in Ontario (from *Child, Family and Community Services Act of Canada* and *Child Protection Law* [Michigan, 1975], MCL 722.623).

Whistleblower Policy

A whistleblower as defined by this policy is an employee of the CRCNA who reports an activity, in good faith that he/she considers to be illegal or dishonest, to their supervisor or the Director of Human Resources. Examples of illegal or dishonest activities are violations of federal, state/provincial, or local laws or fraudulent financial reporting.

Whistleblower protections are provided in two important areas — confidentiality and against retaliation. Insofar as possible, the confidentiality of the whistleblower will be maintained. However, identity may have to be disclosed to conduct a thorough investigation, to comply with the law and to provide accused individuals their legal rights of defense. The CRCNA will not

retaliate against a whistleblower. This includes, but is not limited to, protection from retaliation in the form of an adverse employment action such as termination, compensation decreases, or poor work assignments. Any whistleblower who believes he/she is being retaliated against must contact the director of Human Resources immediately. The right of a whistleblower for protection against retaliation does not include immunity for any personal wrongdoing that is alleged and investigated

Code of Conduct for Employees, Contractors, and Volunteers

In keeping with the mission of the Christian Reformed Church in North America (CRCNA), all staff members are expected to uphold their commitment to professional ethics and Christian values in their relationships and assigned responsibilities. We seek to assure that all persons are treated with dignity, respect, kindness, fairness, and impartiality. Staff members must operate with honesty, integrity and diligence, and are to remain in compliance with all personnel policies outlined in the Employee Handbook.

Each staff member is expected to act as a representative of the CRCNA in their professional and personal conduct, on the job and off the job; furthermore, all staff are expected to comply with the civil laws that govern the national and state or provincial jurisdiction within which they live and work, on and off the job.

All staff members have the right to work in a safe and secure work environment, free from any violent conduct. All staff are expected to conduct themselves in a manner that is free from harassment, threat, and intimidation and are prohibited from bringing weapons, as defined in the Employee Handbook, onto denominational property.

Taking or using without permission any denominational property or property of a fellow employee, client, or visitor to the CRCNA is expressly prohibited. Monetary advances are only allowed for business purposes. The CRCNA does not make loans to employees. Kickbacks and special favors for approving purchase and service agreements are forbidden.

If an employee, or anyone else in the service of the CRCNA, becomes aware of a situation that contravenes the Code of Conduct, she or he is required to report the facts to a supervisor, the Human Resources director, the Director of Finance and Operations or the Executive Director for appropriate action. Employees who become aware of any suspected illegal activity or violation of civil laws should report this to their agency director and the Director of Finance and Operations. The CRCNA will seek to protect employees who report the alleged illegal activities or civil infractions of other employees under applicable local, state, provincial, or federal laws.

Employees found to act in a manner that is inconsistent with the Code of Conduct will be subject to disciplinary action up to and including discharge.

Confidentiality Agreement

For purposes of this Agreement, the term "Confidential Information" shall include, but is not limited to, all records and information received by me during the course of my work with any agency/ministry of the Christian Reformed Church in North America (the "CRCNA") which in any way relate to CRCNA business or its ministries. Such Confidential Information includes information received in notes, files and records, whether in hardcopy form or electronic form, and information received orally.

Confidential Information shall only be used for CRCNA agency/ministry work related purposes. No Confidential Information may be removed from any work premises without permission, except in the ordinary course of performing my duties or services for an agency/ministry of the CRCNA. Confidential Information may not be disclosed to anyone, during or after my employment with or service to an agency/ministry of the CRCNA, except when required as part of my duties for that CRCNA agency/ministry, or with written permission.

Security and confidentiality is a matter of concern for all employees, contractors, interns and/or volunteers who have access to any CRCNA agency/ministry files, electronic documents, applications, and data. Having access to such material involves significant responsibility and trust. Employees and others providing services to any CRCNA agency/ministry must recognize the responsibilities entrusted to them in preserving the strict confidentiality of all Confidential Information.

As an employee, volunteer or intern of a ministry of a CRCNA agency/ministry, I agree to not disclose, publish or otherwise reveal any Confidential Information to any other parties, internally or externally, outside the appropriate course of my duties or services, or without prior, express authorization. In addition I agree to not access information that is not necessary or applicable to my specific duties and responsibilities. I will not use any Confidential Information for my personal benefit. I agree to promptly report any concerns related to improper access to electronic files, applications or data to the Information Technology Director or to the Director Finance and Operations.

I agree to hold Confidential Information in strict confidence and to exercise a reasonable degree of care to prevent disclosure to others.

Upon request, or termination of my employment relationship or services to the CRCNA, I agree to promptly return all CRCNA agency/ministry property and Confidential Information in my possession or control, including but not limited to any drawings, notes, documents (electronic or paper), equipment, and materials received from CRCNA agencies/ministries.

(created 02/26/2015)

Third Party Reporting System

Effective April 1st, we will be implementing an ethics and compliance hotline called “Red Flag Reporting.” Red Flag Reporting is an independent company that is dedicated to protecting organizations including their employees, assets and reputations.

Red Flag Reporting allows for anonymous reporting of any workplace concerns such as harassment, discrimination and safety issues.

Please visit our Canada Health & Safety Site to access Red Flag Reporting should you wish to make an anonymous report. Alternatively, our Health & Safety Incident Reports and Form to File a Formal Discrimination, Harassment, or other Workplace Complaint continue to be available on our Health & Safety site.

Our intent and motivation is to protect our staff and we are grateful for this added tool. We do encourage you to speak directly with a supervisor or to Human Resources when you identify concerns; however, you will also have a new option via Red Flag Reporting.

To file a report, you can visit this site www.RedFlagReporting.com or find the site through our Canada Health & Safety Site ; provide client code CRCNA and simply do one of the following:

- Visit www.RedFlagReporting.com and click on “File a Report”
- Call 1-877-647-3335
- Text RFR to 234-231-9005
- You may also use the following (be sure to be detail oriented, provide our client code, and indicate if you wish to be anonymous or not):
 - o Fax to 330-572-8146
 - o Email to redflag@redflagreporting.com
 - o Mail to RFR, P.O. Box 4230, Akron, Ohio 44321

At your earliest convenience, please view this Employee Training Video to learn how to file a report.