

Harassment Policy, including Sexual Harassment

Policy Against Unlawful Harassment and Discrimination

The Agency is committed to providing a work environment that is free of unlawful harassment. In furtherance of this commitment, the Agency strictly prohibits all forms of unlawful harassment, which includes harassment on the basis of race, religion, color, sex, national origin, citizenship status, uniform service member status, age, genetic information, disability or any other category protected by applicable state or federal law, including Title VII of the Civil Rights Act, 42 U.S.C. § 2000e et seq.; the Louisiana Employment Discrimination Law, La. R.S. 23:302 et seq., and La. R.S. 42:341 et seq.

The Agency's policy against unlawful harassment applies to all employees of the Agency, including supervisors and managers. The Agency prohibits managers, supervisors and employees from harassing co-workers as well as the Agency's clients, vendors, suppliers, independent contractors and others doing business with the Agency. In addition, the Agency prohibits its clients, vendors, suppliers, independent contractors and others doing business with the Agency from harassing our employees.

Violation of this policy will subject an employee to disciplinary action, up to and including immediate termination.

Examples of Prohibited Sexual Harassment: Sexual harassment includes a broad spectrum of conduct. By way of illustration only, and not limitation, some examples of unlawful and unacceptable behavior include:

- unwanted sexual advances;
- offering an employment benefit (such as a raise or promotion or assistance with one's career) in exchange for sexual favors, or threatening an employment detriment (such as termination, demotion, or disciplinary action) for an employee's failure to engage in sexual activity;
- visual conduct, such as leering, making sexual gestures, displaying sexually suggestive objects or pictures, cartoons or posters;
- verbal sexual advances, propositions, requests or comments;
- verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene letters, notes or invitations;
- physical conduct, such as touching, assault, impeding or blocking movement;

Examples of What Constitutes Prohibited Harassment: In addition to the above listed conduct, the Agency strictly prohibits harassment concerning race, color, religion, national origin, age or other protected characteristic. By way of illustration only, and not limitation, prohibited harassment concerning race, color, religion, national origin, age or other protected characteristic includes:

- slurs, epithets, and any other offensive remarks;
- jokes, whether written, verbal, or electronic;
- threats, intimidation, and other menacing behavior;
- other verbal, graphic, or physical conduct; and
- other conduct predicated upon one or more of the protected categories identified in this policy.

If you have any questions about what constitutes harassing behavior, ask your supervisor or another member of management.

Harassment of our clients, or employees of our clients, vendors, suppliers or independent contractors by our employees is also strictly prohibited. Such harassment includes the types of behavior specified in this policy, including sexual advances, verbal or physical conduct of a sexual nature, sexual comments and gender-based insults. Any such harassment will subject an employee to disciplinary action, up to and including immediate termination.

What Should You Do If You Feel You Are Or Have Been Harassed

If you feel that you are being harassed in violation of this policy by another employee, supervisor, manager or third party doing business with the Agency, you should immediately contact the Executive Director or Assistant Director at (985) 532-0459. If your complaint relates to the Executive Director or if you are uncomfortable discussing the complaint with the Executive Director or Assistant Director, you may contact the Chair of the Agency's Board of Directors. In addition, if you observe harassment by another employee, supervisor, manager or non-employee, please report the incident immediately to the Executive Director or Assistant Director. Appropriate action will also be taken in response to violation of this policy by any non-employee.

Your notification of the problem is essential to us. We cannot help resolve a harassment problem unless we know about it. Therefore, it is your responsibility to bring your concerns and/or problems to our attention so that we can take whatever steps are necessary to address the situation.

The Agency takes all complaints of unlawful harassment seriously and will not penalize you or retaliate against you in any way for reporting a harassment problem in good faith.

All complaints of unlawful harassment which are reported to management will be investigated as promptly as possible and corrective action will be taken where warranted. Both the employee making the complaint and the person about whom the complaint is made will be required to participate in the investigation. The Agency prohibits employees from hindering internal investigations and the internal complaint procedure. All complaints of unlawful harassment which are reported to management will be treated with as much confidentiality as possible, consistent with the need to conduct an adequate investigation.

Right to Pursue Action

Any employee has the right to pursue legal action for harassment or other forms of discrimination regardless of the outcome of the Agency's investigation under this policy.

Policy Against Retaliation

The Agency is committed to prohibiting retaliation against those who report, oppose, or participate in an investigation of alleged wrongdoing in the workplace. By way of example only, participating in an investigation of alleged wrongdoing in the workplace, includes, but is not limited to:

- Filing a complaint with a federal or state enforcement or administrative agency;
- Participating in or cooperating with a federal or state enforcement agency that is conducting an investigation of the Agency regarding alleged unlawful activity;
- Testifying as a party, witness, or accused regarding alleged unlawful activity;
- Associating with another employee who is engaged in any of these activities;
- Making or filing an internal complaint with the Agency regarding alleged unlawful activity;
- Providing informal notice to the Agency regarding alleged unlawful activity.

The Agency strictly prohibits any adverse action/retaliation against an employee for participating in an investigation of any alleged wrongdoing in the workplace. If you feel that you are being retaliated against you should immediately contact the Executive Director or Assistant Director. In addition, if you observe retaliation by another employee, supervisor, manager or nonemployee, please report the incident immediately to the Executive Director or Assistant Director.

Any employee determined to be responsible for violating this policy will be subject to appropriate disciplinary action, up to and including termination. Moreover, any employee, supervisor or manager who condones or ignores potential violations of this policy will be subject to appropriate disciplinary action, up to and including termination.

Notwithstanding the above, the Agency's anti-retaliation policy does not protect bad faith complaints. An employee who intentionally makes a complaint under this policy that he or she knows to be false will be subject to appropriate disciplinary action, up to and including termination.

Compliance

- All employees will be required to undergo one hour of training on sexual harassment each year. The Executive Director and all supervisors and Council board members, in addition to the one hour of education and training required for all employees, must complete additional training each year.
- The Executive Director shall maintain records of employees' attendance at mandatory training, complaints submitted under this policy, and action taken on the basis of complaints submitted under this policy.
- By February 1 of each year, beginning on February 1, 2020, the Executive Director shall prepare an annual report regarding compliance with La. R.S. 42:341 *et seq.* The report shall include the following information:
 - The number and percentage of Agency employees who have completed the training required under this policy and under Louisiana law.
 - The number of sexual harassment complaints received by the Agency.
 - The number of complaints that resulted in a finding that sexual harassment occurred.
 - The number of complaints in which the finding of sexual harassment resulted in discipline or corrective action.
 - The amount of time it took to resolve each complaint.
- This policy shall be prominently posted on the Agency's website.