

Cornerstone Behavioral Healthcare

PM.16B Anti-Harassment

Policy Statement

Cornerstone Behavioral Healthcare's (CBH) policy expresses our commitment to maintain a workplace that is free of harassment, so our employees can feel safe and happy. CBH will not tolerate anyone intimidating, humiliating, or sabotaging others in the workplace, at off-site work assignments, or at office-sponsored social functions. CBH also prohibits willful discrimination based on:

- age
- color or race/ethnicity
- national origin
- sex or sexual orientation
- gender or gender identity
- pregnancy status
- religion
- mental/physical disability
- marital status
- veteran status
- body size
- financial status

Definition of Harassment in the Workplace

Harassment includes bullying, intimidation, direct insults, malicious gossip, and victimization. Examples of harassment include, but are not limited to:

- Sabotaging someone's work on purpose
- Commenting derogatorily on a person's ethnic heritage or religious beliefs
- Starting or spreading rumors about a person's personal life
- Ridiculing someone in front of others
- Singling someone out to perform tasks unrelated to their job (e.g., bringing coffee)

Individuals Covered Under the Policy

This anti-harassment policy applies to all employees, including support staff, supervisors, and owners. When individuals are subject to harassment from third parties (e.g. potential and former employees, contractors, vendors, clients), CBH will take the necessary steps available to eliminate the problem.

Company Procedures in Response to Harassment

The following procedure is specifically for addressing the harassment types that are listed above. Please refer to PM. 16 Sexual Harassment on how to file a sexual harassment complaint.

It is the goal of this policy and its procedures to create an environment in which people who have experienced any of the harassment types listed above, or have concerns about harassment issues, feel free to discuss those situations or concerns with someone in a position to do something about them, secure in the knowledge that they will be listened to and treated with respect.

In those instances where an individual decides that they wish for CBH to take action, the individual, or representative acting on behalf of the individual, can choose to speak to the following:

- **The Offender.** If the individual suspects that an offender doesn't realize they are guilty of harassment, the individual could talk to the offender directly in an effort to resolve the issue. This tactic is appropriate for cases of minor harassment (e.g. inappropriate jokes between colleagues)
- **Senior Management.** (e.g., Supervisor, Program Manager, Clinical Director, or CEO)

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- **Human Resources (HR).** The individual can contact HR in any case of harassment, no matter how minor it may seem

If Senior Management determines that an investigation is warranted, it will appoint an investigator who may be a person inside or outside of CBH. The investigator will meet with and make record of the individual's statement of events and all parties involved. Once the investigation is complete, the review board (CEO, Clinical Director, and HR) will review the report and make the resolution decision. The disciplinary action for harassment depends on the severity of the offense and may include counseling, reprimand, suspension, or termination.

Confidentiality

All information will be handled with the highest degree of confidentiality possible under the circumstances and with due regard for the rights and wishes of all parties. While management's investigator will always maintain confidentiality, CBH cannot guarantee that every complainant, alleged offender, or witness in the course of a formal investigation will likewise ensure confidentiality, despite being asked to do so.

Protection Against Retaliation and Retribution

Retaliation and retribution are serious violations of this policy and should be reported immediately to a Supervisor, HR, Clinical Director, or CEO. Retaliation or retribution against any individual for reporting any type of harassment, whether by the harasser or from another source, will not be tolerated and will be treated with the same strict discipline as the harassment itself. Each offense will be investigated and sanctioned separately. Individuals who are not complainants, but who assist in the harassment investigation, will also be protected from retaliation under the policy.

Pursuant to 5 M.R.S.A. § 4553(10)(D), it is illegal to punish or penalize, or attempt to punish or penalize, any person for seeking to exercise any of the civil rights set out in the Maine Human Rights Act, or for complaining of a violation of that Act, or for testifying in a proceeding brought under that Act.

Maine Human Rights Commission

Employees who have been harassed have a right to file a claim with the Maine Human Rights Commission. Although employees may also file a complaint with a court, bypassing the Commission will limit the damages available. The Commission will conduct an investigation to determine if harassment occurred.

An employee may initiate the complaint process with the Commission by calling (207) 624-8729 or by writing to: The Maine Human Rights Commission, State House Station 51, Augusta, ME 04333-0051. A complaint may also be initiated online at <https://www.maine.gov/mhrc/file>.



CEO

11/16/2022

Date