

All Policies – including Human Resources Policies- are found on the Intranet

The screenshot shows a web browser window with the following elements:

- Browser tabs: Home - BID Milton Intranet, Home - BID Milton Intranet, HUMAN RESOURCES - BID MR: x +
- Address bar: Not secure | miltonhospital.clinemapsite.com/policies-and-procedures/human-resources/
- Header: Beth Israel Lahey Health logo, Beth Israel Deaconess Hospital Milton, Search bar.
- Navigation menu: Home, Policies & Procedures, Resources, TDSS, Helpful Links, MEDITECH Expense eLearning Courses.
- Main content area:
 - Section: Policies & Procedures
 - Section: HUMAN RESOURCES
 - Section: Documents:
 - Leave-of-Absence-951-106
 - Leave-of-Absence-951-106.pdf | pdf | 822 KB | Last Changed: 07/02/2020 1:25pm
 - Contract-Personnel-Temporary-Agency-Use-of-Non-Employees-951-613
 - Contract-Personnel-Temporary-Agency-Use-of-Non-Employees-951-613.pdf | pdf | 446 KB | Last Changed: 03/01/2020 11:11am
 - Employee-Access-to-Personnel-Records-951-608
 - Employee-Access-to-Personnel-Records-951-608.pdf | pdf | 154 KB | Last Changed: 03/01/2020 11:11am
 - Telephones-Personal-Communication-Devices-Use-By-Employees-951-605
 - Telephones-Personal-Communication-Devices-Use-By-Employees-951-605.pdf | pdf | 135 KB | Last Changed: 03/01/2020 11:10am
 - Bulletin-Board-Posting-951-602
 - Bulletin-Board-Posting-951-602.pdf | pdf | 94 KB | Last Changed: 03/01/2020 11:10am
 - Workplace-Violence-Prevention-Policy-951-528
 - Workplace-Violence-Prevention-Policy-951-528.pdf | pdf | 435 KB | Last Changed: 03/01/2020 11:10am
- Taskbar: Windows Start button, taskbar icons, system tray showing 1:34 PM 6/25/2020.

Attached is one of our Human Resources policies, “Discrimination and Harassment Policy” – please take time to review this policy and all of our HR policies including:

- Sexual Harassment Policy 951-525
- Earned Time and Extended Illness Bank Policy 951-108
- Massachusetts Earned Sick Time Policy 951-110
- Reporting for Work Attendance Policy 951-507
- Corrective Action 951-520

**BETH ISRAEL DEACONESS HOSPITAL-MILTON
STANDARD PROCEDURE**

SOP# SOP #951-530
Original Issue Date: 05-07-90
Last Review Date: 03-29-2021
Regulatory: N/A

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SUBJECT: **DISCRIMINATION AND HARRASSMENT POLICY**

DEPARTMENT: HUMAN RESOURCES

DISTRIBUTION: All Departments, Volunteers, Students, Contract Services, Medical Staff

POLICY:

We recognize the right of all members of our workforce to work in an environment where individual dignity is respected. All members of the workforce are expected to comply with the Hospital's Code of Conduct and behavior standards of performance. The Hospital has adopted *RESPECT (Responsibility, Empathy, Service Excellence, Professionalism, Efficiency, Cultural Competence and Teamwork)* to describe examples of performance expectations.

It is the goal of Beth Israel Deaconess Hospital – Milton (BID-Milton or the Hospital) to promote a workplace that is free of harassment and discrimination based on race, color, religious creed, sex, age, national origin, ancestry, sexual orientation, gender, gender-identify, physical or mental handicap, military or veteran status or other classification protected by law ("protected status").

IDENTIFIED RISK:

Consistent with the Hospital's commitment to high reliability and as such pro-active risk identification and pre-emptive harm mitigation, this policy seeks to address the following risk:

- To mitigate risk by promoting compliance with state and federal law.

PROHIBITION OF DISCRIMINATION AND HARASSMENT

Harassment or discrimination based on an applicant's or workforce member's protected status that occurs in the workplace, or in other settings in which employees may find themselves in connection with their employment, is unlawful and will not be tolerated by this organization.

Unlawful harassment includes verbal or physical conduct that denigrates, belittles, or shows hostility or aversion to an individual or others because of a protected status that (1) has the purpose or effect of creating an intimidating, hostile, humiliating, or offensive working environment; (2) has the purpose or effect of unreasonably interfering with an individual's work performance; or (3) otherwise adversely affects an individual's workplace opportunities.

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Depending on the circumstances, the following conduct may constitute discriminatory harassment: slurs; epithets or other derogatory comments; negative stereotyping; innuendos; derogatory jokes; demeaning gestures, objects, pictures, cartoons, videos, graphics, websites, text messages, emails, social media posts, or other materials connected to one's membership in a protected group.

Because the Hospital takes allegations of harassment and discrimination seriously, we will respond promptly to complaints of harassment and discrimination. Where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as appropriate under the circumstances, including disciplinary action up to and including termination where appropriate.

The importance of this policy cannot be emphasized enough. An environment free of discrimination and harassment based on protected status is not only the law, it is fundamental to the Hospital's culture. Please note that while this policy sets forth our goals of promoting a workplace that is free of unlawful harassment and discrimination, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the legal definition of harassment or discrimination.

No Retaliation:

All applicants and workforce members should take special note that retaliation against an individual who has complained in good faith about harassment or discrimination, and retaliation against individuals for cooperating in good faith with an investigation of a harassment or discrimination complaint, is unlawful and will not be tolerated by this organization.

Responsibilities of Workforce Members and Managers:

Every workforce member is responsible for behaving in a professional manner that complies with this policy. Every workforce member is also urged to report any behavior that he or she believes violates this policy, whether directed toward him/herself or others, to Human Resources.

Managers are responsible for ensuring compliance with this policy and maintaining a work environment free of unlawful discrimination and harassment. Managers are also responsible for escalating to Human Resources any discrimination or harassment complaints they may receive and any violations of this policy they observe.

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PROCEDURE:

Reporting Prohibited Conduct:

BID-Milton can only address issues of which it is aware. If you feel you have experienced or witnessed any conduct that is inconsistent with this policy, you are to immediately notify your manager or the Senior Director of Human Resources, Cheryl Freed Loew, at (617) 313-1222 or Cheryl.Freed-Loew@bidmilton.org. This may be done in writing or orally. This policy does not require reporting discrimination or harassment to any individual who is creating the harassment.

You may also file a complaint on line at <https://bidmccompliance.alertline.com> or by using the confidential Compliance Hotline: 1- 888-753-6533.

Please note that every workforce member, from entry-level to senior management may raise concerns under this policy. Likewise, complaints under this policy may be raised about the conduct of any workforce member regardless of position or title. Complaints may also be raised about the conduct of any other individuals with whom workforce members must interact as part of their work at BID-Milton.

Harassment/Discrimination Investigation

BID-Milton takes concerns of harassment and discrimination seriously. BID-Milton understands that discrimination and harassment complaints are sensitive matters and commits to treating any workforce member who raises such concerns with dignity, compassion and respect.

When a complaint is received it will be promptly investigated in a fair and expeditious manner. The investigation will generally include private interviews with the person filing the complaint, the person alleged to have committed harassment or discrimination, and any other individuals with relevant information. When the investigation is completed, to the extent appropriate, the person filing the complaint and the person alleged to have committed the conduct resulting in the investigation will be informed.

The investigation will be conducted in such a way as to maintain confidentiality to the extent necessary under the specific circumstances of each particular case. Whether workforce members will be required to maintain confidentiality of an investigation will be determined on a case by case basis. For example, workforce members may be instructed to maintain confidentiality if BID-Milton identifies a need to protect witnesses, avoid destruction of evidence, ensure the truthfulness of testimony, prevent a cover-up, or some other legitimate business reason specific to the particular investigation.

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Disciplinary Action:

If it is determined that inappropriate conduct has been committed by one of our workforce members, BID-Milton will act promptly to eliminate the offending conduct and take such action as is appropriate under the circumstances. Such action may range from counseling to termination of the individual's relationship with BID-Milton and may include such other forms of disciplinary action as is deemed appropriate under the circumstances. The BID-Milton may discipline an employee for any inappropriate conduct discovered in investigating reports made under this policy, regardless of whether the conduct amounts to a violation of law or even a violation of this policy. If the person who engaged in harassment is not employed by BID-Milton, then corrective action will be taken that is reasonable and appropriate under the circumstances.

State and Federal Remedies:

In addition to the above, if you believe you have been subjected to discrimination or harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC - 300 days; MCAD - 300 days).

1. **Equal Employment Opportunity Commission ("EEOC")**
JFK Federal Building
475 Government Center
Boston, MA 02203
(617) 565-3200

2. **Massachusetts Commission Against Discrimination ("MCAD")**
Boston Office:
One Ashburton Place
Room 601
Boston, MA 02108
(617) 994-6000.

POLICY REFERENCES

951-520 Corrective Action Policy
951-525 Sexual Harassment Policy
951-528 Workplace Violence Prevention Policy
951-529 Prohibition Against Retaliation

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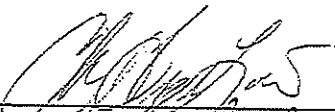
SOP#

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SUBJECT: DISCRIMINATION AND HARRASSMENT POLICY

Personnel policies by their nature are constantly under review as they are affected by changes in applicable laws, economic conditions and the Hospital's business. While the Hospital believes in its policies, they are not conditions of employment and the Hospital reserves the right to revise or terminate policies at any time, and diverge from existing policies when it deems appropriate. Nothing in this Policy is intended to constitute a contract between the Hospital and any employee or other workforce member, or create a promise by the Hospital of any kind, regardless of what this Policy states. Either the Hospital or an employee/workforce member may terminate the relationship with or without cause. Unless an employee has a written agreement for continued employment signed by the employee and an authorized representative of the Hospital, the employee is an at-will employee and either the employee or the Hospital may terminate employment at any time, with or without notice.

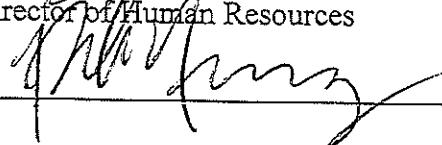
APPROVED



Senior Director of Human Resources

3/29/2021

Date



President

4/2/2021

Date