

## Policy On Sexual and Other Unlawful Harassment

Great Falls Community Broadcasting Company's Mutual Respect Policy

Great Falls Community Broadcasting Company is founded on the belief that all members of the community are worthy of respect and consideration and, as such, our bylaws (Article X) forbid discrimination based on race, color, religion, sex, sexual orientation, creed, or national origin. Our administrative policies state clearly that we do not tolerate disrespect of members of the community and a grievance procedure is outlined in our regulations to address transgressions of this fundamental policy.

Specific among transgressions, Sexual Harassment and Harassment in general are illegal under the laws of the State of Vermont; GFCBC will work diligently to eliminate any such behavior in our work environment.

### Definition of Harassment

Harassment includes unreasonable conduct or behavior that is personally offensive or threatening, impairs morale, or interferes with the work effectiveness of our employees, contract workers, and volunteers. GFCBC prohibits harassment for any discriminatory reason based on Article X of our By Laws and also any harassment conforming but not limited to the following categories:

- Verbal: sexual innuendoes, racial or sexual epithets, derogatory slurs, off-color jokes, propositions, threats, or suggestive or insulting sounds.
- Visual/Non-verbal: derogatory posters, cartoons or drawings; suggestive objects or pictures, graphic commentaries, leering, or obscene gestures.

### Definition of Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal, physical, and nonphysical conduct of a sexual nature. Sexual harassment includes a wide range of behaviors from the actual coercion of sexual relations to unwelcome offensive comments, jokes, innuendoes, and other sexual oriented statements and unwelcome emphasizing of sexual identity. Examples include but are not limited to when:

- Submission to such conduct is made explicitly or implicitly a term or condition of employment or participation
- Submission to or rejection of such conduct by an individual is used as the basis for workplace decisions affecting that individual or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's performance at work or creates an intimidating, hostile, or offensive work environment.

### Consequences for Violating this Policy

An employee, contract worker, or volunteer who has been found to have violated this policy or otherwise acted inappropriately will be subject to disciplinary action, up to and including discontinuance of membership privileges, employment, and access to our facilities. Consequences will follow the grievance procedure of GFCBC as expressed in our training manual and amended from time to time.

### What You Should Do if You Believe You Are Harassed

A clear statement to the person engaging in the offensive behavior is often all that is necessary to stop the conduct. Employees, contract workers, and volunteers who believe they are being harassed are encouraged to let the person engaging in the conduct know how they feel.

Should you feel you are being harassed and the situation is not rectified by direct person-to-person notice to the offending individual or you do not feel comfortable in making this notice to the offending individual, you should immediately report any incidents in person or by mail to the Secretary of the Board of Directors, GFCBC, PO Box 110, Bellows Falls, VT 05101 or, alternatively, to the president of the Board of Directors

All employees, contract workers, and volunteers are expected to be truthful, forthcoming, and cooperative in connection with any complaint investigation or report.

[cont'd.]

## **Investigation and Resolution Procedure**

Informal Procedure: It may be possible to resolve a complaint through a voluntary conversation between the complaining party and the alleged harasser, which is facilitated by a member of the board or, from time to time, another committee or office of the organization. If the complaining party or alleged harasser is a minor under the rules of the State of Vermont, notice will be given to the parent or guardian identified in the participant's applications. The complainant and the alleged harasser are entitled to have a person of their choice accompany them to any meetings or depositions. If the complainant and the alleged harasser feel that a resolution has been achieved then the conversation will remain confidential and no further action will be taken.

If either party or GFCBC choose not to utilize the Informal Procedure, or feels the Informal Procedure is inadequate or unsuccessful, they may proceed to the formal procedure.

Formal Procedure: The Board of Directors shall complete a harassment complaint report based on the verbal allegations of the complaining party. This complaint form shall be kept in a centralized and secure location and is the confidential property of GFCBC.

- a. The complaint report shall detail the described facts and circumstances of the incident or pattern of behavior.
- b. An investigation shall be completed by the Board of Directors or designated authority within 21 calendar days of the first written complaint or report. Investigations will consist of personal interviews with all parties and with any other parties who may have knowledge of the incident(s.) In determining if allegations constitute harassment under the policies of GFCBC, GFCBC will consider all surrounding circumstances, relevant documents, the nature of the behavior, past incidents, the relationship between the parties, and the context in which the alleged infractions were said to occur. The validity of claims of harassment and infractions under this policy is based on all the facts and surrounding circumstances.
- c. The Board of Directors or their designee will make the final determination of the complaints and infractions validity and will take appropriate actions based on its grievance procedures. Actions taken with regard to complaints will be consistent with the requirements of the policies of state and federal law. The Board of Directors will maintain a written report of the proceeding in each complainant's case which remain the confidential property of GFCBC.
- d. The complainant and alleged harasser shall be informed of the decision of the Board of Directors or their designee within the aforementioned 21 day period and of the material terms of any disciplinary action.

## **Confidentiality**

Great Falls Community Broadcasting Company recognizes that both the complainant and the alleged harasser have strong interests in maintaining the confidentiality of the allegations and related information. The privacy of the complainant, the individuals against whom the complaint is filed, and the witnessed will be respected as much as possible, consistent with the legal and ethical obligations to investigate and to take appropriate actions.

## **Extra-Organizations Procedures**

In addition to or instead of filing a harassment complaint through this policy, a person may choose to exercise other options, including but not limited to filing a complaint with outside agencies or the court system.

A charge of harassment may also be investigated by the Vermont Human Rights Commission and the Office for Civil Rights of the US Department of Education.

## **Acknowledgment of This Policy.**

All employees, contract workers, and volunteers participating in the operations of Great Falls Community Broadcasting Company are obligated to acknowledge their knowledge and understanding of the terms of this policy and to sign a copy of this policy as an indication of this understanding PRIOR to commencement of any activity within the direct control of Great Falls Community Broadcasting Company.

Agreed and Understood

---

Signature / Name / Date