



VOLUNTEER/INTERN PACKET CHECKLIST

I, _____, a

Volunteer/intern with the following *Community Action* program
_____, has received the following

Community Action policies and procedures:

- Equal Employment Opportunity and ADA
- CORI/BRC Check information
- Privacy & Confidentiality
- Fraud, Waste, and Abuse Prevention Policy
- Disclosure, Addressing, and Resolving Complaints and Investigations
- Smoking
- Volunteer Conduct
- Unlawful Harassment
- Mandated Reporter
- Information Technology (IT) Usage
- Customer Service Standards
- Guidelines to Improve Indoor Air Quality

By signing my name below, I acknowledge that I have received the Community Action policies, and that I understand and accept all of the policies and conditions of employment set forth therein.

Date: _____

Volunteer Signature: _____

Supervisor Signature: _____

EQUAL OPPORTUNITY AND ADA

1. *Equal Opportunity Policy*

It is the policy of Community Action that no person shall, on the grounds of their race, color, religious creed, national origin, ancestry, sex, age, disability, sexual orientation, veteran status, genetics, or gender identity, pregnancy status, or any other classification protected by law be discriminated against in employment or in any way be excluded from participation in or be denied the benefits in connection with any program or activity under the sponsorship of Community Action.

This policy applies to recruitment, hiring, selection of personnel for training opportunities, promotion, transfers, disciplinary actions, terminations and all aspects of program activities.

This policy is based on Title VI and Title VII of the Civil Rights Act of 1964, Section 624 of the Economic Opportunity Act of 1964, the Age Discrimination in Employment Act of 1967, Section 504 of the Rehabilitation Act of 1973, Chapter 151B of the Massachusetts General Laws, the Americans with Disabilities Act of 1990 (“ADA”), the Americans with Disabilities Amendment Acts of 2009 (ADAA), and all other applicable employment-related laws.

2. *Americans with Disabilities Policy*

Community Action does not discriminate on the basis of disability. Program applicants, participants, members of the general public, volunteers, employees, job applicants and others are eligible to participate in and benefit from all agency programs, activities and services without regard to disability. This includes reasonable accommodations to employment policies and procedures and effective communications support afforded to all volunteers requiring such accommodation. It also includes reasonable modification of programming to support participation in all programming and activities without regard to disability.

All Head Start/Early Head Start volunteers must be mentally and physically able to perform the duties assigned to them with reasonable accommodation as required by law.

Inquiries, accommodation requests, and complaints should be directed to the ADA Coordinator Director of Human Resources at 393 Main Street, Greenfield, MA 01301. Volunteers are required to complete an Accommodation Request Form and submit a Physician Certification form.

Volunteers who need auxiliary aids for effective communication with respect to programs and services of Community Action are invited to make their needs and preferences known to the Director of the program with which they are dealing.

CORI/BACKGROUND RECORD CHECK

CORI Check:

Where Criminal Offender Record Information (CORI) checks are part of a general

background check for employment, volunteer work or licensing purposes, the following practices and procedures will generally be followed.

All volunteers, or interns who will work for the agency are required to complete applicable pre-employment checks.

- a. CORI checks will only be conducted as authorized by the applicant and to the extent permissible by the Department of Criminal Justice Information Services (DCJIS). All applicants will be notified that a CORI check will be conducted and will be required to sign a CORI Acknowledgment Form. If requested, the applicant will be provided with a copy of the CORI policy. Prior to questioning an applicant about their criminal history the applicant will be provided with a copy of any criminal record in possession of Community Action, whether obtained from DCJIS or any other source.
- b. An informed review of a criminal record requires adequate training. Accordingly, all personnel authorized to review CORI in the decision-making process will be thoroughly familiar with the educational and training materials made available and required by DCJIS.
- c. Unless otherwise provided by law, a criminal record will not automatically disqualify an applicant. Rather, determinations of suitability based on CORI checks will be made consistent with this policy and any applicable law or regulations.
- d. If a criminal record is received from DCJIS or any other source, the authorized individual will closely compare the record provided by DCJIS with the information on the CORI Acknowledgment Form and any other identifying information provided by the applicant, to ensure the record relates to the applicant.
- e. If Community Action is inclined to make an adverse decision based on the results of the CORI check, the applicant, volunteer, or intern will be notified immediately. The applicant shall be provided with a copy of the criminal record and the organization's CORI policy, advised of the part(s) of the record that make the individual unsuitable for the position or license, and given an opportunity to dispute the accuracy and relevance of the CORI record.
- f. Applicants challenging the accuracy of the policy shall be provided a copy of DCJIS's Information Concerning the Process in Correcting a Criminal Record. If the CORI record provided does not exactly match the identification information provided by the applicant, Community Action will make a determination based on a comparison of the CORI record and documents provided by the applicant. Community Action may contact DCJIS and request a detailed search consistent with DCJIS policy.
- g. If Community Action reasonably believes the record belongs to the applicant and is accurate, based on the information as provided in section (d) on this policy, then the determination of suitability for the position or license will be made. Unless otherwise provided by law, factors considered in determining suitability may include, but not be limited to the following:
 - (a) Relevance of the crime to the position sought;
 - (b) The nature of the work to be performed;
 - (c) Time since the conviction;
 - (d) Age of the candidate at the time of the offense;
 - (e) Seriousness and specific circumstances of the offense;
 - (f) The number of offenses;
 - (g) Whether the applicant has pending charges;
 - (h) Any relevant evidence of rehabilitation or lack thereof;

- (i) Any other relevant information, including information submitted by the candidate or requested by the hiring authority
- h. Community Action will notify the applicant of the decision and the basis of the decision in a timely manner.
- i. CORI check will be conducted every three years.

Background Record Check:

Prior to hiring, Community Action will also require a Background Record Check (BRC) which includes Criminal Record Offender (C.O.R.I), check with the Department of Children and Families (DCF), Sex Offender Registry Information (SORI) check and Finger-print based national CORI's for all Head Start/Early Head Start Employees, the Senior Administrative Team, and any other select employee who will regularly conduct business at HS & ELP sites. Employment may start when Community Action receives a provisional letter from EEC and if Community Action can comply with the notice requirements. Continued employment is contingent upon successful completion of the fingerprint based national CORI. Under certain circumstances, Community Action reserves the right to require any other prospective employee, volunteer, or intern to a Background Record Check.

- a. Potential employees, volunteers, interns, or contractors with reported existence of abuse or neglect findings will be notified of such findings and given the opportunity to participate in a Discretionary Review Process. The employee, volunteer, intern, or contractor will be notified in writing and will not be able to begin work until the Discretionary Review is completed.
- b. Contractors will be required to perform background checks on all employees with unsupervised contact with children and provide Community Action with written assurances of compliance.

Volunteers may be required to comply with other program background record check requirements.

PRIVACY AND CONFIDENTIALITY

This Privacy and Confidentiality Policy has been adopted to assure confidentiality and protection of individual rights to privacy for clients/participants and employees. The individual dignity of clients/participants, volunteers, and employees shall be respected and protected at all times. All volunteers will be required to sign a Confidentiality Statement upon assignment.

Information about clients/participants or Community Action/HS & ELP business must not be divulged to anyone other than persons who are authorized to receive such information. This policy extends to both internal and external disclosure.

1. Confidentiality of Participants', Children's and Families' Information
 - All clients'/participants' records must be locked in a secure file.
 - Access to clients'/participants' records is limited to volunteers on an as-needed and appropriate basis.
 - Clients'/Participants' records must not be removed, however, copies can be made for purposes of audit, investigation, family needs, school transition, or as otherwise needed as consistent with state and federal law.

- Clients'/Participants' records must never be left on desks, tables, etc. where others have access to them.
 - Clients'/Participants' private information must never be discussed among volunteers and employees except on a "need to know" basis. Volunteers and Employees must be particularly aware of their surroundings when discussing this information. Special caution must be taken to be sure other clients/participants or volunteers and employees do not overhear information that is private.
 - Discussion of clients'/participants' information with volunteers, other clients/participants, friends, or community members is prohibited.
 - Information and documents which are considered confidential are medical records, educational records, special needs records, family records, financial records, and any other private information about clients/participants, their families or Community Action/HS & ELP business.
 - All requests for release of information will be coordinated by designated program employee and will comply with applicable laws.
 - Identifiable information will only be released in accordance with state and federal confidentiality laws.
2. Confidentiality of Volunteer/Employee's Information
- All of an employee's records must be locked in a secure file.
 - Access to an employee's records is limited to appropriate employees on a "need to know" basis.
 - An employee's records must not be removed; however, copies can be made for purposes of audit, investigation, or as otherwise needed as consistent with state and federal law.
 - An employee's records must never be left out on desks, tables, etc. where other people may have access to them.
 - Employees must be particularly aware of their surroundings when discussing employee information. Special caution must be taken to be sure other children, families, or employees do not overhear information that is private.
 - Discussion of an employee's information with volunteers, families, friends, or community members is prohibited.
 - The HR Director will coordinate all requests for release of information.
 - Information will only be released in accordance with state and federal confidentiality laws when appropriate.

Community Action Mediation programs operate under additional guidelines related to client information.

3. HS & ELP has procedures in place for the management of program data and to support effectively the availability, usability, integrity, and security of the data. HS & ELP employees will follow the HS & ELP Data Management Plan and Procedure (available on agency's internal website) for sharing and protections for the privacy of child records. The following are regulations in regards to managing personally identifiable information (PII):
- Records for each child are kept in a locked file and electronically in PROMIS. Access to electronic files are granted only when required by individual position.
 - An employee will obtain a parent's written consent before disclosing PII from child records

- The parent's written consent will provide specifics of what child records may be disclosed, explains why the records will be disclosed, and identifies the party(s) to whom the records may be disclosed.
- The program may disclose without parental consent but with parental notice and opportunity to refuse under certain circumstances.
- The program may disclose with parental consent under certain circumstances.
- The program collects employee information for the Brazelton Touch Points Center (BTPC) collaboration. The BTPC will comply with the agency's contract and keep information confidential as noted.

4. Violation of Confidentiality Policy: Any employee who violates the Confidentiality Policy will be subject to disciplinary action, up to and including termination.

Community Action Mediation programs operate under additional guidelines related to client information.

FRAUD, WASTE, AND ABUSE PREVENTION POLICY

Community Action is committed to safeguarding the government and private funds, goods, and services it receives so that those resources are used for their intended purposes. Any misuse or misappropriation of funds or other assets detracts from Community Action's ability to provide the maximum level of service to the participants and communities it services, jeopardizes the current and future receipt of government and private funds, goods, and services, and abuses the trust agency donors have placed in the agency. Community Action has written policies and procedures to ensure internal controls are in place to protect the agency from fraud, waste, and abuse. Employees, volunteers, sub-contractors, interns, Policy Council, and Board of Directors are responsible for the detection, prevention, and/or reporting of fraud, waste, misuse of funds and other irregularities and for complying with Community Action policies and procedures.

Fraud is defined as the intentional misrepresentation or concealment of a material fact for the purpose of personal or financial gain. Waste and Abuse is defined as incidents or practices that are inconsistent with legal, accepted, and sound business, fiscal, or administrative practices that result in programs incurring unnecessary costs or not being able to carry out intended activities due to lack of funds.

Types of fraud include, but are not limited to the following:

- Knowingly making false statements on financial and programmatic documents and/or reports.
- Enrollment staff who intentionally violate Federal and program eligibility determination regulations and who enroll pregnant women and children that are not eligible to receive Head Start or Early Head Start services.
- Misappropriation of funds or other assets.
- Causing payments to be made to fictitious parties or to individuals or companies that have not provided goods or services, including staff, or inflating invoices.
- Impropriety in the handling or reporting of money or financial transactions.
- Bid rigging and collusion.

- Bribery.
- Kickbacks.
- Conflicts of interest resulting in improper financial gain to staff volunteers, interns, subcontractors, and /or board members.
- Submitting false participant eligibility information.

DISCLOSURE, ADDRESSING AND RESOLVING COMPLAINTS AND INVESTIGATIONS

All volunteers and employees are responsible for the detection, prevention, and /or reporting of fraud, waste, misuse of funds and other irregularities and for complying with Community Action policies and procedures. It is the policy of Community Action to be responsive, timely, and appropriate in our response to receipt of complaints of lack of compliance with the laws, regulations and policies that govern our program, including any investigations or allegations of wrongdoing by individuals outside of Community Action or by any Community Action employee, volunteer, agent, or contractor. In addition to a violation of federal or state law, such as committing fraud, “wrongdoing” includes violations of Community Action’s Conflicts of Interest policy.

Any individuals, who have knowledge of or, in good faith, suspect any wrongdoing in Community Action’s business or financial practices or operations, or violation of the Conflicts of Interest policy, shall report it internally so that Community Action can work with legal counsel to investigate and take appropriate action. Community Action will take each complaint or allegation of wrongdoing seriously. Community Action will timely investigate and report, if appropriate, as well as discipline, as appropriate, any Community Action employee, volunteer, agent or contractor who is found to have engaged in wrongdoing.

Community Action will not punish or penalize any “whistleblower,” a person who makes a report of alleged wrongdoing in good faith based on their knowledge of such wrongdoing or has reasonable cause to suspect such wrongdoing. If, however, a person knowingly and willfully fabricates an allegation of wrongdoing, then Community Action shall have good cause to investigate, discipline, and/or terminate the person who made the fictitious report.

Further, it is the policy of Community Action that it and its employees and volunteers will not knowingly alter, destroy, mutilate, cover up, conceal, falsify or make a false entry in any record or document with intent to impede, obstruct or influence investigations, including federal investigations (such as those by the Office of Inspector General) or bankruptcy investigations.

1. Reporting of Complaints Regarding Internal Operations, Fraud, Waste and Abuse, and Use of Federal Funds
 - a. Anyone who becomes aware of or in good faith suspects wrongdoing by another employee, a Governing Board or Policy Council member, a vendor, a contractor, or a volunteer, should report it promptly to the Director of Human Resources or Executive Director. In cases in which Executive Director is alleged to be involved, the President of the Board of Directors. Either the

Director of Human Resources or the President shall become the “point person.”

- b. The individual making the report (the “complainant”) may do so by reporting the concern in writing. Community Action will attempt to maintain the confidentiality of the person reporting the concern, but cannot guarantee it. Anyone making an internal anonymous report must realize that the person conducting or coordinating the investigation will not be able to ask questions of the person reporting, nor advise the person of the outcome.
- c. The point person will notify the complainant that the concern has been received and will be reviewed and investigated as appropriate. The point person will also explain that depending on the issue, they may not be able to tell the person making the report of the outcome (for example, personnel matters are private matters). The point person will offer to keep the complainant informed of progress, if appropriate.
- d. Community Action encourages self-reporting of one’s own wrong-doing. Community Action shall consider self-reporting as it determines disciplinary action.

2. Investigation of Complaints

- a. Upon receiving a report of a complaint or an alleged wrongdoing, the point person will then initiate an investigation into the allegations. The point person will follow the steps included herein to determine the nature, scope, and duration of the complaint or wrongdoing, if any.
- b. Investigations of complaints regarding serious or otherwise sensitive matters, including but not limited to any violations of law or regulations or suspected fraud, should be conducted under the direction of or by Community Action’s legal counsel. If the involvement of legal counsel is warranted, then legal counsel should be engaged. The point person will be responsible for requesting that legal counsel (1) initiate an investigation of the conduct in question, (2) prepare a report of findings to the point person, and (3) recommend the appropriate actions to be taken by point person or Community Action.
- c. Upon receipt of information concerning alleged misconduct, the point person will, at a minimum, take the following actions:
 - i. Ensure that the investigation is initiated as soon as reasonably possible but in any event not more than two (2) weeks) following receipt of the information. Under the direction of legal counsel, the investigation shall include, as applicable, but not be limited to:
 - Interviews of all persons who may have knowledge of the alleged conduct and a review of the applicable laws, regulations and standards to determine whether or not a violation has occurred.
 - Identification and review of relevant documentation to determine the specific nature and scope of the violation and its frequency, duration and potential financial magnitude.
 - ii. For any investigations not involving serious or otherwise sensitive matters in which Community Action’s legal counsel is not involved, ensure that significant

developments are promptly reported to the point person so that a determination can be made as to whether Community Action's legal counsel should be contacted.

iii. Situations involving harassment should be turned over to the Human Resources Director.

iv. Ensure that the investigation is completed in a reasonable and timely fashion and that the appropriate disciplinary or corrective action is taken, if warranted.

v. Contact the complainant to explain the complaint has been received and is being addressed.

3. Corrective Action

a. In the event the investigation substantiates misconduct or suspected criminal activity, Community Action will develop an appropriate corrective action, including but not limited to:

i. Community Action will, as quickly as possible, cease the offending practice.

ii. Community Action will consult with legal counsel to determine whether voluntary reporting of the identified misconduct to the appropriate governmental authority (e.g., the granting agency, the OIG) is warranted.

iii. If applicable, Community Action will calculate and repay any improper payments made by a federal or state government program as a result of the misconduct.

iv. To the extent that Community Action deems that the circumstances necessitate disciplinary action of a Community Action employee or volunteer for wrongdoing, Community Action may exercise appropriate disciplinary action tailored to the circumstances and severity of the allegation in accordance with other parts of this handbook. Appropriate disciplinary action may include, but is not limited to, reprimand, demotion, suspension and/or termination. If the investigation uncovers what appears to be criminal conduct on the part of an employee or volunteer, appropriate disciplinary action against the employee, volunteer or employees who authorized, engaged in or otherwise participated in the offending practice will include, at a minimum, the removal of the person from any position of oversight and may include, in addition, suspension, demotion, and termination. However, nothing herein alters the at-will relationship.

v. Promptly undertake appropriate training and education to prevent a recurrence of the misconduct.

vi. Conduct a review of applicable Community Action policies and procedures to determine whether revisions or the development of new policies and/or procedures are needed to minimize future risk of noncompliance.

vii. Conduct, as appropriate, follow-up monitoring and auditing to ensure effective resolution of the offending practice.

viii. Review whether it is appropriate to follow up with the complainant to explain the issue has been resolved.

4. No Retaliation

Retaliation or reprisal in any form against anyone who makes a report of wrongdoing, cooperates in an investigation, or participates in compliance activities is strictly prohibited. If an employee, volunteer, or a contractor believes that an adverse action in the form of reprisal or retaliation has been taken against him or her as the result of

making a report or cooperating in an investigation pursuant to this or any other compliance policy, they should report it to the point person.

5. **Bad Faith Reporting**

Anyone who makes a report of wrongdoing maliciously, frivolously, knowingly, or willfully in bad faith will be subject to disciplinary action up to and including termination, as well as pursuit of any legal penalties that may apply.

6. **Documentation**

No records or documents relevant to an investigation may be knowingly altered, destroyed, mutilated, covered up, concealed, falsified or edited with false entries. If there is any question about how long to retain certain documents, the point person will consult with legal counsel.

All employees and volunteers of the Agency shall:

a. Disclose to the Executive Director or Director of Compliance the existence and extent of their interest or the interest of an immediate family member in or association with any agency or organization that may be the subject of consideration for the award of a contract or grant utilizing funds provided by the Agency.

b. Bring to the attention of the Executive Director or Director of Compliance any facts or circumstances known to that person that bear upon the fairness of the proposed grant or contract, including any information that the award of the grant or contract would not be in the best interest of the Agency.

c. Abstain from participation in the consideration of any contract or grant award to any agency or organization in which the individual has an interest in or with which the individual is associated.

d. Disclose to the Supervisor the existence of any previous or current relationship with a program participant or a person served by Community Action with whom the employee or volunteer would interact in the course of regular job duties. The supervisor will assess whether the work done or to be undertaken should be reassigned to another employee or volunteer. Confidentiality of participant information will be maintained at all times.

SMOKING POLICY

Community Action is a smoke-free workplace and complies with all local and state ordinances regarding smoking, including the Pro-Children Act of 1994. Community Action prohibits smoking, use of e-cigarettes, or vaping devices in agency vehicles. Community Action prohibits the use of e-cigarette or vaping devices in places where smoking is prohibited by law and agency policy.

EMPLOYEE & VOLUNTEER CONDUCT

Professional and ethical behavior is the guide for all of the activities of Community Action's employees and volunteers. Our value systems and our standard of service are designed to

promote the mission of the organization and are in accordance with our customer service standards. It is essential that we conduct ourselves and our business so that everyone we work with, our participants, our colleagues, our supervisors and our community, know that we have committed ourselves to an excellence built upon the foundation of outstanding ethical performance.

All employees and volunteers are expected to comply with the expectations and policies of the agency as detailed in this Personnel Handbook. Since it is not possible to detail in the Personnel Handbook all the standards of conduct that are unacceptable, Community Action expects that employees and volunteers will use common sense and good judgment in achieving a standard of professional behavior. Employees and volunteers may not excuse their conduct simply because the Employee Handbook does not specifically prohibit the action or behavior.

All employees and volunteers will adhere to the following expectations at a minimum:

1. All employees and volunteers are expected to protect and respect the privacy of program participants, other staff and providers.
2. Employees and volunteers should always make a point of being neat, clean and well-groomed as appropriate to the job and setting.
3. Employees and volunteers should refrain from using loud, abusive or obscene language at any time in the presence of participants or outside providers.
4. Employees and volunteers may not bring weapons, including but not limited to knives, guns, pepper spray, of any kind to any work site or work related site.
5. Employee and volunteer shall not report to work under the influence of drugs, marijuana, or alcohol; employees and volunteers shall not possess, distribute, sell, or use, or operate under the influence of alcohol, marijuana, illegal drugs, or other controlled substances during work time or while on agency business.
6. Employees may not refuse to perform work within the scope of their duties as outlined in their job description.
7. Harassment of any kind of any employee, volunteer, or client will not be tolerated.
8. Employees and volunteers should avoid any situation that involves a conflict of interest (as detailed in the Conflict of Interest Policy above) with their duty to, or with any interest of, Community Action. Employees and volunteers have an obligation to advise their supervisor of any matters that might be considered sensitive in preserving Community Action's reputation for honesty and integrity.
9. Employees and volunteers should inform the supervisor of any pre-existing relationship with a program participant or person served by Community Action. If appropriate, the supervisor will reassign the participant to another employee.
10. Employees and volunteers will not remove Community Action property from its premises without written authorization.
11. Any employee or volunteer who is representing Community Action or attending a Community Action sponsored or related event such as a conference, staff party or other work-endorsed activity whether on paid time or not, is expected to conduct her/himself in a professional, responsible and respectful manner.
12. No employee or volunteer may use the resources of Community Action for any purpose other than work of the agency unless specifically allowed by policy.

13. Falsification of time sheets or reimbursement requests will lead to immediate termination. Employees using Community Action's electronic timesheet system are strictly prohibited from sharing their password to the system or from having another employee submit a timesheet on their behalf.
14. It is the employee's responsibility to notify their supervisor directly (in person, by e-mail, voicemail or telephone) within one hour of the beginning of the workday that any type of leave is being taken. If notification is not made, this will be considered an unexcused absence and the employee will be required to use annual leave accruals, unless otherwise protected by state or federal law (MA Sick Leave Law) If such absence without notification continues for three days, it will be declared an abandonment of the position by the employee and dismissal will be immediate.

All Head Start/Early Head Start employees and volunteers must comply with the additional Standards of Conduct which reflect the Head Start Performance Standards which are listed below.

There is an expectation that staff, consultants, contractors, and volunteers will conduct themselves in a professional manner at all times while representing Community Action or HS & ELP in any capacity. This includes, but is not limited to: the workplace; attending conferences paid for or sponsored by HS & ELP; participating on committees; attending meetings with other agencies or community members. Staff, consultants, contractors, and volunteers will also adhere to privacy and confidentiality guidelines at all times (see below).

The following additional Standards of Conduct apply to all Head Start/Early Head Start staff, consultants, contractors, and volunteers:

1. Will respect and promote the unique identity of each child and family and refrain from stereotyping on the any basis, including gender, race, ethnicity, culture, religion, disability, sexual orientation, or family composition.
2. Will follow the program's Privacy and Confidentiality policies concerning information about children, families and other staff members (see below).
3. No child will be left alone or unsupervised while under the care of Community Action, HS & ELP, Family Child Care Homes, consultants, contractors, or volunteers while under their care.
4. Will use positive methods of child guidance and will not engage in corporal punishment, emotional or physical abuse, or humiliation. In addition, they will not employ methods of discipline that involve isolation, the use of food as punishment or reward, or the denial of basic needs (see also Child Guidance Policy).
5. Will not maltreat or endanger the health or safety of children, including, at a minimum that staff must not:
 - a. Use corporal punishment;
 - b. Use isolation to discipline a child;
 - c. Bind or tie a child to restrict movement or tape a child's mouth;
 - d. Use or withhold food as a punishment or reward;
 - e. Use toilet learning/training methods that punish, demean, or humiliate a child;
 - f. Use any form of emotional abuse, including public or private humiliation, rejecting, terrorizing, extended ignoring, or corrupting a child;
 - g. Physically abuse a child;

- h. Use any form of verbal abuse, including profane, sarcastic language, threats, or derogatory remarks about the child or child's family; or
- i. Use physical activity or outdoor time as a punishment or reward;

Any instance of inappropriate conduct can be cause for discipline, up to and including immediate termination.

UNLAWFUL HARASSMENT POLICY

It is the intent of Community Action to promote a workplace that is free of unlawful harassment. Unlawful harassment in the workplace, or in other settings in which employees or volunteers may find themselves in connection with their employment, as defined below, is unlawful discrimination under federal and state law and will not be tolerated. Retaliation against an individual who has complained about unlawful harassment or retaliation against individuals for cooperating with an investigation of an unlawful harassment complaint is also unlawful and will not be tolerated.

DEFINITIONS

Unlawful harassment is verbal (i.e. stereotypical terms, derogatory statements, abusive language or discriminatory remarks) or physical conduct that degrades or shows aversion to an individual because of their race, color, religion, national origin, sex, ancestry, age, sexual orientation, disability, pregnancy status, pregnancy-related conditions, veteran status, genetics, or gender identity that has the purpose or effect of unreasonably interfering with an individual's work performance. Harassment is behavior that is not welcomed and has the effect of creating a workplace environment that is hostile, offensive, intimidating or humiliating to an employee or volunteer.

Sexual Harassment is one form of unlawful harassment.

Definition of Sexual Harassment: In Massachusetts, the legal definition for sexual harassment is: sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- a. Submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or
- b. Such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct that if unwelcome, and has the effect of creating a workplace environment that is hostile, offensive, intimidating or humiliating, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances – whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one’s sex life, comment on an individual’s body, comment about an individual’s sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one’s sexual experiences; and
- Discussion of one’s sexual activities.

It is the goal of Community Action to promote a workplace that is free of sexual harassment. Sexual harassment of employees or volunteers occurring in the workplace or in other settings in which employees or volunteers may find themselves in connection with their employment is unlawful per Title IX of the Civil Rights Act of 1964 and will not be tolerated by this organization. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with if encountered by employees or volunteers.

REPORTS OF COMPLAINTS

Community Action will follow the Disclosure, Addressing, & Resolving Complaints and Investigations Policy to respond promptly to complaints of unlawful harassment. When it is determined that unlawful harassment has occurred, Community Action will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

If an employee or volunteer believes that they have been subjected to unlawful harassment, sexual harassment, or has witnessed unlawful harassment, the employee or volunteer has the right and obligation to report such conduct. Each supervisor or manager who is aware of an incident of potential unlawful harassment must report such conduct.

When possible or appropriate, the employee or volunteer is encouraged to let the alleged perpetrator know that the behavior is offensive before or concurrent with filing a complaint. However, no employee or volunteer is required to do so before filing a complaint. Complaints will be investigated following the procedures of the Disclosure, Addressing, and Resolving Complaints and Investigations Policy.

Reports should be made by contacting either of the following individuals:

Director of Human Resources
Community Action
393 Main St.
Greenfield, MA 01301
(413) 376-1152

Or

Executive Director
Community Action
393 Main St.
Greenfield, MA 01301
(413) 386-1128

State and Federal Remedies: In addition to the above, if you believe you have been subjected to sexual harassment, unlawful harassment or discriminated against on the basis of pregnancy or a pregnancy-related condition, 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 specific time period for filing a claim (EEOC – 300 days; MCAD – 300 days).

1. The Massachusetts Commission Against Discrimination (“MCAD”) Boston Office: One Ashburton Place, Rm. 601, Boston, MA 02108, (617) 994-6000. Springfield Office: 424 Dwight Street, Rm. 220, Springfield, MA 01103, (413) 739-2145.
2. The United States Equal Employment Opportunity Commission (“EEOC”) One Congress Street, 10th Floor Boston, MA 02114, (617) 565-3200.

MANDATED REPORTER

The agency expects any employee, intern, volunteer, or sub-contractor who suspects neglect or abuse of participants to report their concerns directly to their supervisor or someone else in the chain of supervision. All staff is immune from civil or criminal liability as a result of filing a report of abuse or neglect if the report was made in good faith. The agency’s No Retaliation policy will apply to anyone reporting such concerns.

All staff is obligated to report offenses of abuse and neglect immediately if there is “reasonable cause to believe” the offense occurred. If a child, elder or disabled person is at risk of imminent harm, the staff member will file a verbal report and then follow up with someone in the line of supervision as soon as possible. The Executive Director or designee will be notified of the report.

Any staff person who suspects abuse or neglect ***in any category*** should report those suspicions to their supervisor, or someone else up the line of supervision if the supervisor is not available, as soon as possible – immediately in an extreme or crisis situation. The supervisor will consult with other program/department managers, and with other staff who might have corroborating or supporting information. The Supervisor and the person who has the information most critical to the report will jointly make the call to file a verbal report and follow it up with a written report.

Decisions to inform parents that a report of child abuse or neglect has been filed are made on an individual basis, placing highest priority on the safety and well-being of the child.

Any staff filing a report must file a written report to the appropriate state agency within 48 hours after a verbal report has been made.

All Head Start/Early Head Start Employees must comply with the Mandated Reporter procedures outlined in the HS & ELP Staff Handbook

There are separate statutes for different categories for protected individuals. As defined by Massachusetts state law, employees working in the following professional roles are mandated reporters:

1. DISABLED PERSONS:

All Community Action employees are mandated to report suspected neglect or abuse of disabled persons under MGL Chapter 19c, Section 1.

A disabled person is defined as someone 18 to 59 years old, who has an intellectual, mental, and/or physical disability to the extent that they are wholly or partially dependent on others to meet their daily living needs.

Types of reportable incidents include physical, sexual, or emotional abuse, neglect, financial exploitation, and “any act or omission which results in serious physical or emotional injury”. The standard for reporting suspected abuse or neglect in Massachusetts is reasonable suspicion that abuse or neglect exists.

2. CHILDREN:

The following employees are also mandated to report suspected neglect or abuse of children under 18 (MGL Chapter 119, Section 51A):

HS & ELP staff

Head Start/Early Head Start Employees

Please reference the HS & ELP handbook for procedures.

Healthy Families Staff

Family services and Childcare Staff

Licensed social workers

Licensed allied mental health and human services professionals

or any other staff member as required by Chapter 119, Section 51A

3. ELDERS:

All family counselors and licensed social workers are also mandated to report suspected neglect or abuse of elders (MGL Chapter 19a, Section 15).

Documentation and tracking of incidents will be maintained in each program.

CHILD SUPPORT REFERRAL POLICY (SECTION 678(B)(1)(2) OF THE CSBG STATUTE)

Child Support Referral (Child Support Referral (Service Category: “Youth and Family Services”) - The federal CSBG Act requires CAAs to inform custodial parents in single-parent families who participate in CSBG-funded activities or services about the availability of child support services and to refer eligible parents to state and local government child support offices.

As part of the intake process for our programs serving single-parent families, we regularly do the following:

1. Ask all participants questions about sources of income and whom this income supports;
2. If the participant is a single-parent, provide information on Child Support Services by:
 - providing the (800) 332-2733 number

- or, by referring the participant to: www.state.ma.us/cse, and describing the services of the Child Support Enforcement Division around collecting and distributing child support and no-fee legal representation in the courts.
3. Refer people to the Massachusetts Department of Revenue, Child Support Enforcement Division publication titled “Paternity Guide for Unmarried Parents”, found at the following website: <http://www.mass.gov/dor/child-support/your-child-support/resources/brochures-and-information-sheets/>

INFORMATION TECHNOLOGY (IT) USAGE POLICIES

Community Action’s information systems support its work and ability to operate efficiently. As such, systems must be protected from misuse, exposure to viruses and damages that could lead to breach of information and increased liability. All IT systems and separate components are the property of Community Action. Community Action has provided these systems for use in conducting business. All communications and information transmitted by, received from, or stored in these systems are records and property of Community Action. IT systems may not be used to solicit for religious or political causes, commercial enterprises, outside organizations, or other non-job related solicitations during working time.

All messages created, sent or retrieved over the Internet are the property of the agency. Community Action reserves the right to audit, intercept, and access any and all matters on its system for any reason without the permission of any employee or volunteer and without notice. Employee and volunteer should not have an expectation of privacy with Community Action’s systems, including computers, phones, and cell phones. Use of passwords or other security measures does not diminish in any way Community Action's rights to access materials on its system, or create any privacy rights of employees and volunteers in the messages and files on the system. All communications including text and images can be disclosed to law enforcement or other third parties without prior consent of the sender or the receiver.

Community Action publishes an IT User’s Guide, which is regularly updated and includes information on virus protection and many other system securities related issues. All staff is expected to familiarize themselves with this information and is responsible for following these requirements.

Any computers accessing the agency’s IT systems must have current anti-virus protection and firewall when applicable, installed and functioning.

A. CONFIDENTIALITY AND PROTECTED INFORMATION

All Community Action policies regarding confidentiality apply to use of telephone, electronic mail, computer and use of the Internet, including use of social networking services and any externally hosted services subscribed to by Community Action. All staff members shall maintain propriety and an appreciation of the importance of keeping confidential all information concerning clients, even though such information may become a matter of public record. No identifying information shall be transmitted over the agency IT systems unless properly encrypted in an attachment.

Some data is specifically protected under Massachusetts law. Personal Information is defined as the first name and last name or first initial and last name in combination with any one or more of the following:

1. Social Security number
2. Driver's license number or state-issued identification card number
3. Financial account number, or credit or debit card number (Based on 201 CMR 17.02) (Based on 201 CMR 17.02)

Protected Client Information will not be stored on agency laptop computers or other portable devices or media (i.e. flash drives, CDs, DVDs, etc.) or transmitted by email or any other electronic means unless properly encrypted. (See Community Action Laptop policy for additional information pertaining to agency laptops.) All staff are not permitted to download Community Action confidentially information on non-agency computers for any purpose, including working on projects at home.

B. COMPUTER USER ACCOUNTS

All staff using computers containing agency data will be assigned unique user accounts, including username and confidential password. This password shall not be shared with anyone else including your supervisor. The only exception is IT Services for the purpose of setting up and servicing your account and assigned computer(s).

The employee's or volunteer's supervisor will notify IT Services as soon as possible of any pending termination of employment. Employee and volunteer access to all accounts including email shall be terminated promptly at the end of employment.

Files and information which must be shared in the course of routine business should be stored in areas where it may be accessed from outside your account by appropriate staff. If an employee or volunteer is absent and access to their computer and/or files becomes necessary, IT Services can provide access at the direction of the supervisor.

C. INTERNET AND ELECTRONIC MAIL SYSTEM

Internet and electronic mail (e-mail) systems have been provided to staff members for the benefit of the organization and its clients. Staff may communicate within Community Action and with vendors, clients, and regulatory agencies, and connect to information resources around the world as needed. These accounts are not intended to be used for personal reasons and may not be used for personal reasons during working time. Every staff member has a responsibility to maintain and enhance the agency's public image, and to use the Internet for work in a productive manner. All staff is expected to be responsible, productive Internet users and abide by all Community Action policies.

D. E-MAIL SYSTEM

E-mail should be checked on a regular basis as individual job requirements dictate. It is highly recommended that all accounts be checked at least daily. Important information for all employees and volunteers (if applicable) is most effectively sent by e-mail. While we will continue to make efforts to disseminate information in other ways, "everyone" e-mails will continue to be the most effective way to reach all employees. For this reason, it is important to check e-mail regularly.

Under normal circumstances, e-mail received in one's regular Community Action account

should not be automatically forwarded to any account outside the Community Action network.

E-mail messages should not be stored on the system longer than necessary. Contracts, registrations, budget, personnel, client or other information which needs to be retained for an extended period should be placed into limited access folders rather than being kept in the user's own account.

E. ACCEPTABLE USES OF THE INTERNET

Staff represents the agency when accessing the internet. Staff is responsible for seeing that the Internet is used in an effective, ethical and lawful manner. All communications are subject to agency policies regarding information disclosure. Each staff member is responsible for the content of all text, audio or images that they place or send – over the Internet. (See the agency's Unlawful Harassment Policy.) All messages communicated on the Internet should have a name attached. No messages will be transmitted under an assumed name. Users may not attempt to obscure the origin of any message. Information published on the Internet should not violate or infringe upon the rights of others.

Community Action's system should not be used to circumvent the Conflict of Interests policy. Solicitation of non-agency business is strictly prohibited during working time. Use of the Internet must not disrupt the operation of the agency network or the networks of other users. It must not interfere with employees' or volunteers' productivity. Viewing sites containing offensive or obscene material on Community Action computers or using Community Action IT systems is grounds for immediate dismissal of employment.

F. SOFTWARE

To prevent computer viruses from being transmitted through the system there will be no unauthorized downloading of any software. All software downloaded will be done through IT Services. Community Action and its staff shall honor all software licenses relative to information and programs used on the agency's computer systems. Software that is not licensed by Community Action or provided under contract by authorized agencies will NOT be installed or run on Community Action's computer system. Agency software will NOT be installed on staff's own personal computers unless appropriate licensing provisions have been followed, and staff has agreed in writing to remove said software from their computer upon agency request or termination of employment. With the approval of the supervisor and the IT Services, limited use of outside IT tools, including Windows Messenger and e-mail forwarding may be allowed if there is a legitimate business reason to do so that has been approved in advance.

G. COPYRIGHT ISSUES

Community Action and its staff shall honor all copyrights relative to information and programs used on the agency's computer systems. Copyrighted materials belonging to entities other than this agency may not be transmitted by staff members on the Internet. Users are not permitted to copy, transfer, rename, add or delete information or programs belonging to other users unless given express permission to do so by the owner. Failure to observe copyright or license agreements may result in legal action by the copyright owner.

H. HARRASSMENT

Employees and volunteers are governed by the Conditions of Employment/Code of Conduct and the agency's Unlawful Harassment Policy in all settings. If, at any time, employees or volunteers receive threatening or harassing messages, employees and volunteers should notify their supervisor and IT Services immediately. Community Action will take appropriate measures to ensure security, including notifying local police.

I. VOICEMAIL

Employees and volunteers are reminded to be courteous to other users of the phone system and always to conduct themselves in a professional manner. Employees will use professional and courteous greetings on their voicemail boxes so as to properly represent the agency to outside callers. Voicemails are sometimes misdirected or forwarded and may be heard by persons other than the intended recipient. Users should create voicemail communications with no less care, judgment and responsibility than they would use for letters or internal memoranda written on Community Action letterhead.

Users should routinely delete outdated or otherwise unnecessary voicemails. These deletions will help keep the system running smoothly and effectively, as well as minimize maintenance costs.

J. SOCIAL MEDIA POLICY

If, for either personal or professional purposes, you are using social media tools, if you have your own blog, or if you are posting comments on other people's blogs, Community Action reminds all employees and volunteers to be aware of how their behavior may be perceived.

Community Action reserves the right to review, supervise and manage all agency related social media postings on any Community Action related site.

Social Media also referred to as Web 2.0, Social Networking, or Social Marketing, is defined by Wikipedia as the use of web-based and mobile technologies to turn communication into an interactive dialogue. The difference from previous web interfaces is that these are interactive, meaning they allow the creation and exchange of user-generated content. This includes but is not limited to Facebook, Twitter, YouTube, and blogs.

1. PERSONAL USE OF SOCIAL MEDIA

Employees and volunteers should not access social networking sites, such as Facebook, Myspace, Twitter and YouTube, for personal use during working time. These sites may only be used during working time for appropriate, work-related uses that have been approved in advance. Employees and volunteers may only maintain social media profiles under the name or linked to Community Action with prior written authorization by the Executive Director or their designee.

The use of social media to post or display comments about coworkers or supervisors or Community Action that are non-compliant with the agency's Unlawful Harassment policy is prohibited. Any harassment, bullying, discrimination, or retaliation that would not be permissible in the workplace is not permissible between coworkers online, even if done after hours, from home, and on home computers.

Please keep the following guidelines in mind when using social media.

Be Responsible

- Use common sense.
- Respect copyright and fair use laws; this includes trademarks such as logos, slogans, and various digital content (art, music, photos, etc.) which may require permission from the copyright owner.
- Always cite sources and link where possible.
- When disagreeing with others' opinions, keep it civil to the extent possible.
- Be the first to correct your own mistakes.
- Ensure that your social media use does not interfere with your work commitments.
- Remember that everything you contribute online stays forever, even if you “remove/delete” it later or attempt to make it anonymous, and that everything you do, even on a personal basis, could reflect on Community Action as an organization.

Identify Yourself

- Be authentic and transparent.
- You may not use Community Action logos or trademarks as a part of your postings, including in your identity on a site, unless you are approved to do so.
- When discussing topics relevant to Community Action, use your real name, be clear who you are, and identify that you work for Community Action.
- Do not represent yourself or Community Action in a false or misleading way.
- Unless given permission by your supervisor, you are not authorized to speak on behalf of the agency, or to represent that you do so.
- If you publish content about your work or subjects associated with Community Action, use a disclaimer such as “The opinions expressed here are my own and do not necessarily represent the views and opinions of Community Action.”
- Be aware that this disclaimer does not free you from the obligations you have under the Community Action Employee Conduct guidelines.

Protect Privacy

- Respect and maintain the confidentiality of the agency and its customers and vendors. Do not divulge or discuss sensitive, proprietary, confidential, or financial information, internal documents, or details about a customer or vendor of Community Action.
- Do not collect or store personal data about third parties without their knowledge or consent.
- Protect your own privacy. What you publish will be around for a long time, so consider the content carefully; also be cautious in disclosing personal details. The nature of social media networks is such that privacy is limited. Some social media sites have been known to change privacy settings with limited or no notice to users.
- Use unique passwords that are not easily guessed by others.

2. USE OF SOCIAL MEDIA FOR AGENCY PURPOSES

Just as with traditional media, we have an opportunity and a responsibility to effectively manage Community Action's reputation online and to selectively engage and participate in social media. Our Mission Statement and customer service, public relations, and employee conduct guidelines and policies provide the foundation for our Social Media Policy. As an Agency representative, your posts must convey the same outstanding ethical and professional standards that the Agency promotes in all of its communications. Be respectful of all individual differences in compliance with the agency's Unlawful Harassment policy.

When using social media *on behalf* of Community Action, all of the items listed as guidelines in the previous employee section should be considered as rules to follow, in addition to those listed below.

- All requirements listed in the "Agency Guidelines on Public Relations Materials and Statements" must be followed where possible.
- Participation in or use of social media should serve to achieve an agency goal, such as:
 - ✓ Expanding and strengthening Community Action's work to promote economic justice and improve the quality of life for people with low incomes.
 - ✓ Improving communication with employees, volunteers, clients, and partners.
 - ✓ Increasing the agency's ability to broadcast its messages to the widest possible audience.
 - ✓ Communicating time-sensitive information as quickly as possible (example: emergency information).
- While the use of social media tools is encouraged, it must be done with a high level of commitment. This means setting time aside *regularly* to attend to posts, comments, feedback, and questions.
- Department staff will be responsible for the content and upkeep of any social media sites their department may create. At least two people need to be responsible for each social media site sponsored by a department.
- Community Action reserves the right to restrict or remove any content that is deemed in violation of this social media policy or any applicable law. The designated administrator(s) must have access that will enable to immediate editing or removal of content from any social media site used by any program or department.
- Use a warm, open, and approachable tone. Remember that part of Community Action's image is formed by the public's interaction with us. We all want that image to be a positive one.
- Do not publish or cite personal details and photographs about Community Action clients, employees, volunteers, partners, or vendors without their prior written permission. Give credit where credit is due, and always attribute when quoting someone else.
- Keep posts clear and concise.
- Don't spam. You can link to other Community Action blog posts or information about services, but do it subtly and only in response to a specific query.
- Social media tools should be used as consistently as possible across all agency departments.
- All Community Action social media sites will be subject to prior approval by the Community Action Social Media Committee.
- Wherever possible, content posted to Community Action social media sites will also be available on Community Action's main website or should contain links directing users back to the Community Action's official websites for in-depth information, forms, documents, or online services necessary to conduct business with Community Action.

- Users and visitors to social media sites shall be notified that the intended purpose of the site is to serve as a mechanism for communication between agency departments and members of the public.
- Community Action social media sites will not contain any of the following:
 - ✓ Profane language or content.
 - ✓ Content that promotes, fosters, or perpetuates discrimination as described in the agency’s Unlawful Harassment Policy.
 - ✓ Illegal activity or encouragement of illegal activity.
 - ✓ Information that may compromise someone’s safety.

Guidelines for Cell Phone Use While Driving on Community Action Business. Please refer to the Motor Vehicle Safety Program policy and the “Agreement”. All employees and volunteers are expected to comply with the policy and procedures.

K. AGENCY LAPTOPS

1. NETWORK CONNECTIVITY

Approved laptop users shall complete training on proper methods of connecting to the agency network. Using a wireless connection is the preferred method but if necessary a designated network cable can be connected as demonstrated during training.

2. CARE AND USE

Employees and volunteers are responsible for following the Use of Community Action Property policy. Loss, damages or theft of Company property must be reported immediately.

3. DATA BACKUP & ENCRYPTION

Laptop users will take special care to make sure their data is backed up properly in the event of laptop malfunction or theft. Data should be stored in the user’s OneDrive or in SharePoint. Any confidential protected data must be stored in an encrypted document on laptops or any other portable storage device.

4. UPDATES

Laptop upgrades will be installed at least once every other week, but no less than once a month. In the event that errors are detected in installing updates or any other need arises that requires IT Services to examine the laptop, the user shall make arrangements to return the computer to IT Services as soon as possible. Microsoft and other updates are now available on the network for laptops at any time. They are no longer restricted to overnight download. *This applies only to laptops.*

Laptop users will initiate the upgrade process on their own. See specific instructions in the IT User’s Guide. Your laptop may request that you restart your laptop once the updates have been installed. Do so at your earliest convenience.

L. VIOLATIONS

Violations of any guidelines listed above may result in disciplinary action up to and including termination. If necessary, the agency will advise appropriate legal officials of any illegal violations.

COMMUNITY ACTION CUSTOMER SERVICE STANDARDS

PROFESSIONAL CONDUCT, SERVICE & PRESENTATION

- Identify yourself by name
- Have your name, position and Community Action on your outgoing message

- Let the caller know how long they can expect to be on hold
- Use your tone of voice and language to convey your desire to be helpful
- Observe compassionate and professional behaviors even when irritated, angry, grouchy
- Return calls as promptly as possible and let the caller know realistically how long it will take to meet their request. If you don't have an answer to their question, research it and get back to the person.
- Dress is neat casual business attire; guidelines are established within each Department

WELCOME PEOPLE

- Acknowledge person's presence
- Greet the person and ask how you can help
- Determine whether person needs any accommodation including language
- Assist people who may be lost or unsure which program/person they are seeking

CREATE A WELCOMING ENVIRONMENT

- Observe Indoor Air Quality Guidelines
- Display Materials, decorations and art that reflect many cultures
- Space is pleasant, welcoming, child friendly as needed, and as accessible as reasonable
- There is clear and bi-lingual signage

BE INFORMED

- Be aware of different learning styles, communication styles
- Be current on best practices, resources pertinent to your position and appropriate referrals
- Know how to get the answers if you don't know them, whether for participants or staff
- Get information/respond to requests from participants or staff in a timely manner, which includes reading and responding to e-mail regularly

VALUE, RESPECT AND FOSTER DIVERSITY

- Know your consumers, (including staff) use approaches appropriate to them
- Use language person will understand
- Know how to access Language Access Network, use a TTY (as necessary)
- Treat others as they wish to be treated

PROTECT PARTICIPANT AND STAFF PRIVACY & CONFIDENTIALITY

- Provide as much physical and traditional, cell, cordless and wireless phone, and FAX privacy as possible
- Remember that e-mail cannot guarantee any privacy or confidentiality and is the property of Community Action
- Protect and secure participant and personnel files at all times
- Discuss only what you have permission to discuss about participants
- Observe the privacy and confidentiality of co-workers' personal and personnel issues

UTILIZE CUSTOMER FEEDBACK

- Each program will have and use a tool to measure customer satisfaction
- Each program will provide a mechanism for customer input, suggestions and complaints.

WHY DOES COMMUNITY ACTION NEED GUIDELINES TO IMPROVE INDOOR AIR QUALITY?

BECAUSE WE CARE ABOUT THE HEALTH OF OUR STAFF AND CLIENTS

Did you know...

- One in five people experiences health problems when exposed to fragrances which include soap, hand lotion, laundry soap and scented dryer sheets, aftershave, detergent, personal care products, cleansers, insect repellent, air fresheners.
- 72% of asthmatics have adverse reactions to perfume and other fragrances.
- Your skin is the largest organ of the body and directly absorbs fragrance chemicals that are applied to it.
- Even if you don't use fragrances, you inhale and absorb other people's fragrances just like second-hand smoke.
- Environmental illness caused by exposure to chemicals is widespread and growing. It has been shown that up to 20 to 30% of the US population reacts to one or more synthetic chemical substances. Children, reproductive age people, asthmatics, allergic and chemically injured people are especially vulnerable.

What are some of the associated health risks?

- Damage to immune system and endocrine systems.
- Fatigue.
- Nausea, vomiting, abdominal pain.
- Drop or rise in blood pressure.
- Headache, migraine, depression, irritability, memory loss, impaired concentration, insomnia, anxiety, cognitive dysfunction and other symptoms.
- Kidney or liver damage.
- Seizures

Any of these problems can lead to staff absenteeism or participant exclusion.

Now that you are aware of some of the health and access problems that can result from fragrances and other harmful chemicals in our air, take time to review these Guidelines to Improve Indoor Air Quality for *Community Action* staff and participants.

GUIDELINES TO IMPROVING INDOOR AIR QUALITY

Community Action wants all employee, volunteers, and participants to feel comfortable and welcome. In order to address those who have asthma, chemical sensitivities or allergies, Community Action has the following guidelines, which cover general issues and solutions. It is Community Action's intention to find reasonable solutions for all concerned to the extent possible.

Scents: Community Action requests that employees and volunteers refrain from using scented products when they come to work in recognition of the adverse effects scented personal care products and perfumes have on many individuals. Additionally, signs will be posted requesting program participants to do the same. Please know that no one will be turned away. Whenever possible, participants will be informed of the policy before they arrive for services. This issue is particularly important in those spaces with no or inadequate ventilation. Community Action recognizes that some people will feel infringed upon by this request. Community Action encourages discussion and negotiation to address the feelings that may arise for staff or participants.

Air quality: Many of the Community Action programs are located in old buildings, with non-air tight windows and doors, providing more than adequate ventilation. When indoor air quality

issues have been identified, Community Action will endeavor to clean (or have cleaned by the owners) air ducts where they exist. In addition, Community Action will provide air purifiers or fans where needed.

Cleaning products: Many cleaning products now used are not only irritating but also toxic. It is the goal to use this scent-free cleaning product at all sites where Community Action is responsible for the cleaning. This includes hand and dish soap as well as other cleansers, air fresheners and disinfectants.

Smoking: All Community Action sites are smoke-free. However, problems still arise when smokers unknowingly smoke too close to open doors. Signs will be posted by the doors where this is a problem requesting that smokers either move well away from the open doors or close the doors. The basement of the main building is particularly vulnerable as smoke is drawn in through intake vents as well as the back door and gets drawn down the hall and up the stairs.

Repairs/renovations: In consideration of people's adverse reactions to such things as paint, polyurethane, new carpeting etc. Community Action will request that all affected parties be notified of repairs or renovations as soon as is practical, so that alternate work site arrangements may be made where appropriate. In addition, Community Action will endeavor to request staff and contractors to use the least toxic products wherever possible.

Individual accommodation: Community Action will continue to work with affected staff and participants to make reasonable accommodation to those with asthma, allergies, chemical sensitivities and multiple chemical sensitivities (MCS) In a case where a conflict arises between staff about the appropriate implementation of this policy, the individuals will be requested to negotiate a resolution utilizing the conflict resolution policy if needed.

Education: Community Action will inform staff about the health consequences of exposure to fragrance chemicals, toxic chemicals and other harmful substances in personal care and laundry products, cleaning products and building materials and furnishings. Information about allergies, asthma, chemical sensitivities and alternative products will be available.