

**Catholic Charities of the Archdiocese of  
St Paul and Minneapolis**

**AFFIRMATIVE ACTION PROGRAM**

**03/13/2018 – 03/12/2022**

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## DESCRIPTION OF ORGANIZATION

Catholic Charities of the Archdiocese of St Paul and Minneapolis serves those most in need. We are a leader in solving poverty, creating opportunity and advocating for justice in the community.

After nearly 150 years of service to the community, Catholic Charities is now the largest comprehensive social service and civic impact organization serving the greater Minneapolis and St. Paul region. We continue to adapt and respond to the needs of the community and focus our attention where it is most needed. With the support of our donors, advocates and volunteers, we seek to prevent poverty before it takes hold, meet basic needs in times of crisis, and create pathways out of poverty. Catholic Charities services include providing shelter and housing for adults and families experiencing homelessness, day treatment and residential programs for children, resettlement programs for new Americans, social service delivery to Older Adults, and Medical Respite for homeless individuals discharged from ER departments.

### Address and Key Contact information

**Catholic Charities**  
**1200 2<sup>nd</sup> Ave S**  
**Minneapolis, MN 55403**

**Peter Spink, Senior Director of Human Resources**  
**[peter.spink@cctwincities.org](mailto:peter.spink@cctwincities.org), 612-204-8403**

## DEFINITIONS USED IN THIS AAP

**Individual with a Disability:** any person who has a physical, sensory, or mental impairment which “materially” (Minnesota) or “substantially” (federal) limits one or more major life activities, or has a record of or is regarded as having such an impairment. "Individual with a Disability" does not include an alcohol or drug abuser whose current use of alcohol or drugs renders that individual a direct threat to property or the safety of others.

**American Indian or Alaska Native** - a person having origins in any of the original peoples of North and South America (including Central America), and who maintains tribal affiliation or community attachment.

**Asian** - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian subcontinent including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.

**Black or African American** - A person having origins in any of the black racial groups of Africa.

**Hispanic or Latino** - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin, regardless of race.

**Native Hawaiian or Other Pacific Islander** - A person having origins in any of the original peoples of Hawaii, Guam, Samoa, or other Pacific Islands.

**White** - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.

**Minority** – Any person who identifies as being American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, Native Hawaiian or Other Pacific Islander, or in any combination of these identifiers, or someone who identifies as White and as any of the other identifiers.

**Job Groups:** Although companies are not limited to using these broad job groups as the only means of analyzing their workforce, we use the following as guidelines:

*Managers and Administrators:* Administrative personnel set broad policies, exercise overall responsibility for execution of these policies, and direct individual departments or special phases of an organization's operations. This category includes: officials, executives, middle management, plant managers, department managers, and superintendents, salaried supervisors who are members of management, purchasing agents, and buyers. Unless specifically listed under officials and managers or craft (skilled), first line supervisors, who engage in the same activities as the employees they supervise, should not be reported under this category.

*Professionals and Technicians:* Professionals are considered to be persons working in occupations requiring either college graduation or comparable work experience. Technicians are those whose work requires a combination of basic scientific knowledge and manual skills such as can be attained through two-year technical or community college degrees or equivalent on-the-job training.

*Sales Workers:* Occupations engaged wholly or primarily in direct selling. This includes: advertising agents and sales agents, insurance agents and brokers, real estate agents and brokers, sales agents and sales clerks, grocery clerks, cashiers/checkers.

*Office and Clerical:* All clerical work regardless of the level of difficulty in which activities are predominantly non-manual (though some manual work not directly involved with altering or transporting the products is included). This includes: bookkeepers, collectors, messengers, and office helpers, office machine operators, shipping and receiving clerks, stenographers, typists, secretaries, and telephone operators.

*Skilled Crafts:* Manual workers of a relatively high skill level who have a thorough and comprehensive knowledge of the process involved in their work. They exercise considerable independent judgment and usually receive an extensive period of training. This includes: building trades, hourly paid foremen and

lead-workers who are not members of management, mechanics and repairmen, skilled machinery occupations, electricians. Exclude learners and helpers of craft workers (apprentices).

*Operatives: (Semi-skilled):* Workers who operate machines or processing equipment or perform other factory-type duties of an intermediate skill level which can be mastered in a few weeks and requires only limited training. This includes: apprentices, operatives, attendants, delivery and route drivers, truck and tractor drivers, dressmakers, weavers, welders. Include craft apprentices in such fields as auto mechanics, printing, metalwork, carpentry, plumbing and other building trades.

*Laborers: (Unskilled):* Workers in manual occupations which generally require no special training. They perform elementary duties which may be learned in a few days and which require the application of little or no independent judgment. This includes: garage laborers, car washers, gardeners, and lumber workers, laborers performing lifting, digging, mixing and loading.

*Service Workers:* Workers in both protective and non protective service occupations. This includes: attendants, clean-up workers, janitors, guards, police, fire fighters, waiters and waitresses.

**Underutilization:** The Minnesota Department of Human Rights defines underutilization in a job group if the number of women or people of color in a job group are less than what is expected based on the availability percentage data adopted for the analysis.

The Department uses the "WHOLE-PERSON RULE" in determining underutilization.

Declaration of underutilization does not indicate discrimination has occurred in a company; rather, it is an opportunity to enable a company to apply good faith efforts to ensure equal employment opportunities continually occur in the business.

## Equal Employment Opportunity (EEO) Policy

*From the Catholic Charities Employee Handbook:*

It is Catholic Charities' policy to provide equal employment opportunities to all employees and applicants for employment in accordance with all applicable laws and regulations. Accordingly, Catholic Charities will not tolerate discrimination against or harassment of any employee or applicant for employment based on protected class status as defined by applicable law. It is our policy to comply with all applicable equal employment opportunity laws and regulations. To the extent required by applicable federal, state or local laws, our decisions about recruiting, hiring, training, promotions, compensation, benefits, and all other similar employment decisions must be made in compliance with this policy and such laws without regard to race, creed, color, religion, sex, national origin, age, marital or familial status, disability, status with regard to public assistance, membership or activity in a local commission, sexual or affectional preference or orientation, genetic history, veterans status or any other class status protected pursuant to applicable laws. We will take affirmative action to ensure that our employment practices are free of discrimination.


It is our policy not to discriminate against pregnant women and qualified individuals with disabilities and to provide reasonable accommodations to otherwise qualified applicants and employees. It is also our policy to make reasonable efforts to accommodate the religious observances and practices of our employees, except where requested accommodations would cause undue hardship on the operation of the agency. A religious accommodation may be appropriate, for example, to the dress code concerning facial hair and hair length (although health, safety and other factors will also be considered).

It is your responsibility to inform your supervisor and Human Resources, preferably in writing, if you believe that a reasonable accommodation is necessary due to a work-related limitation. You must state to the best of your ability the specific work change, adjustment or accommodation requested.

We have developed and maintain a current Affirmative Action Program designed to promote and implement equal employment opportunity for employees and applicants for employment. We will evaluate the performance of our management and supervisory personnel with regard to their involvement in achieving affirmative action objectives and their furtherance of the principle of equal employment opportunity, consistent with our values of diversity and justice. We appointed, as our Affirmative Action Officer and EEO and Americans with Disabilities Act Coordinator, our Senior Director of Human Resources, whose responsibilities include monitoring all EEO activities and reporting on the effectiveness of our Affirmative Action Program, as required by federal, state and local agencies. The Senior Director of Human Resources will be given necessary top management support and staffing to fulfill such responsibilities.

I have appointed Peter Spink to manage the company's Equal Employment Opportunity ("EEO") program. This person's responsibilities include monitoring all EEO activities and reporting the effectiveness of the company's Affirmative Action program as required by law. I will receive and review reports on the progress of the program. Any employee or applicant may inspect our Affirmative Action Plan and information related to our EEO program during normal business hours. Please contact the EEO manager listed above for further information.

Any employee or applicant for employment who believes s/he has been treated in a way that violates this policy should contact either Peter Spink at 1200 2nd Ave S, Minneapolis, MN 55403 [peter.spink@cctwincities.org](mailto:peter.spink@cctwincities.org), 612-204-8403 or any other management representative, including me. The company will take immediate action to investigate and address allegations of discrimination or harassment confidentially and promptly.



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Tim Marx, CEO, Catholic Charities



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Date:

## **ASSIGNMENT OF RESPONSIBILITY FOR AFFIRMATIVE ACTION PROGRAM**

Peter Spink, the Senior Director of Human Resources is designated as the company's EEO manager and is tasked with monitoring all employment activity to ensure that our EEO/AA policies are being carried out. The EEO/AA manager has been given the necessary staffing and support from senior management to fulfill the duties of the position. These duties include, but are not limited to, the following:

1. Develop an EEO policy statement and Affirmative Action Plan ("AAP") that are consistent with the company's EEO policies and establish our affirmative action goals and objectives.
2. Develop and implement internal and external strategies for disseminating the company's AAP and EEO policies.
3. Conduct and/or coordinate EEO/AA training and orientation.
4. Ensure that our managers and supervisors understand it is their responsibility to take action to prevent the harassment of employees and applicants for employment.
5. Ensure that all minority, female, and disabled employees are provided equal opportunity as it relates to organization-sponsored training programs, recreational/social activities, benefit plans, pay and other working conditions.
6. Implement and maintain EEO audit, reporting, and record-keeping systems in order to measure the effectiveness of our Affirmative Action Plan/Program and to determine whether our goals and objectives have been attained.
7. Coordinate the implementation of necessary affirmative action to meet compliance requirements and goals.

8. Serve as liaison between our organization and relevant governmental enforcement agencies.
9. Coordinate the recruitment and employment of women, people of color, and individuals with disabilities, and coordinate the recruitment and utilization of businesses owned by women, people of color, and individuals with disabilities.
10. Coordinate employee and company support of community action programs that may lead to the full employment of women, people of color, and individuals with disabilities.
11. Keep management informed of the latest developments in the area of EEO.

## **INTERNAL AND EXTERNAL DISSEMINATION OF AFFIRMATIVE ACTION POLICY AND PLAN**

### **A. Internal Dissemination**

1. Our EEO policy statement is included in our employee handbooks.
2. We will publicize our EEO policy in any newsletters, magazines, annual reports, or other media the company utilizes.
3. Schedule special meetings for all other employees to discuss the policy and explain individual employee responsibilities;
4. We will discuss the policy thoroughly during both employee orientation and management training programs;
5. We will meet with union officials to provide notice of our EEO policy and ask for their cooperation in implementing the policy.
6. We will include non-discrimination clauses in all of our union agreements and review all contractual provisions to ensure they are non-discriminatory.
7. We will publish articles in any company publications covering our EEO programs, progress reports, and the accomplishments of disabled and female employees and employees of color.
8. Our EEO policy statement and non-discrimination posters will be permanently posted and conspicuously displayed in areas available to employees and applicants for employment.
9. When employees are featured in product or consumer advertising, employee handbooks, or similar publications, we will include images of male and female employees, employees of color, and disabled employees.



10. Communicate to employees the existence of our affirmative action program and make available the elements of its program as well as enable prospective employees to know and avail themselves of all of our program's benefits.
11. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes are carefully selected and trained to ensure that the goals and commitments in the company's affirmative action program are implemented.

## **B. External Dissemination**

1. We will notify all recruiting sources of the company's EEO policy, stipulating that these sources actively recruit and refer women and people of color for all positions listed.
2. We will hold formal briefing sessions with representatives from recruiting sources. As an integral part of these briefings, we will include facility tours; clear and concise explanations of current and future job openings; position descriptions; worker specifications; explanations of the company's selection process; and, recruiting literature. We will make formal arrangements regarding applicant referrals, and follow-up with referral sources regarding the disposition of applicants.
3. Any disabled employees who wish to participate in career days, youth motivation programs, and related community activities will be given opportunity to do so.
4. Any recruiting efforts at schools will include specific outreach to disabled students.
5. We will make an effort to participate in work study programs with rehabilitation facilities and schools that specialize in the training or educating disabled individuals.
6. We will use all available resources to continue or establish on-the-job training programs.
7. We will incorporate the equal opportunity clause into all purchase orders, leases, and contracts.
8. We will send written notification of the company's EEO policy to all sub-contractors, vendors, and suppliers, and request cooperative action from them.
9. We will notify community agencies, community leaders, secondary schools, colleges, and organizations that promote women, people of color, and disabled individuals regarding the company's EEO policy.
10. When employees are featured in consumer or help wanted advertising, we will include images of male and female employees, employees of color, and disabled employees.
11. We will communicate the existence of our EEO policy to prospective employees and provide sufficient information to enable prospective employees to avail themselves of the policy's benefits.

## **INTERNAL AUDIT AND REPORTING SYSTEMS**

Our EEO manager has responsibility for implementing and monitoring our affirmative action programs. Department heads, managers, and supervisors are responsible for providing the EEO manager with information and/or statistical data as necessary to measure our good faith efforts to implement our programs. In addition, they are also responsible for submitting formal reports to the EEO Manager on a scheduled basis regarding the degree to which corporate or unit goals are attained and timetables are met.

At least annually, internal audit reports will be prepared in table format and dated. Data collected for these reports will include applicant flow, new hires, promotions, transfers, and terminations (voluntary and involuntary) by job group. Figures for each personnel process must show a breakdown by sex, minority classification, and disability status. Reports will be disseminated to appropriate levels of management, and any problem areas will be addressed as promptly as possible.

We will preserve all audit data and other applicable documentation and information available as required by law to the Minnesota Department of Human Rights and other government agencies.

Also, once a year we will submit to the Minnesota Department of Human Rights, on or before, the anniversary date of our Workforce Certificate of Compliance, our **Annual Compliance Report** as required under Minnesota Administrative Rule 5000.3580 for the company's regular workforce.

## **WORKFORCE ANALYSIS**

### **Availability/Utilization/Underutilization Analysis**

The affirmative action plan must include a workforce analysis based on data that is no more than one year old, including a listing of each job title as it appears in your payroll records ranked from the lowest to the highest paid in each department. If there are separate work units or lines of progression within a department, a separate list must be provided for each work unit, or line, including unit supervisors.

## **GOALS AND TIMETABLES**

We will make a good faith effort to achieve the availability percentages for people of color or women in any and all job group(s) where we have identified underutilization. We have identified underutilization in our Laborer Job Group of 1 female. We will work towards achieving the availability percentage in this category within one calendar year. We will continue good faith efforts to recruit and retain individuals with disabilities in all levels of our workforce.

## PROBLEM AREA IDENTIFICATION

Catholic Charities of the Archdiocese of St Paul and Minneapolis periodically conducts an in-depth analysis of its total employment process to determine whether and where impediments to equal employment opportunity may exist. We evaluated:

1. **Workforce composition by job group:** we have identified underutilization in our availability/utilization/underutilization analysis (AUUA) and we have set goals to remedy that underutilization.
2. **Personnel activity:** We will routinely conduct adverse impact analyses using the “Eighty Percent Test” or other statistical methods to analyze our personnel activities, including applicant flow, hires, promotions, terminations and other personnel actions, to determine if there are selection disparities between men and women, people of color, nonminority (and within specific racial groups, if appropriate), or disabled and nondisabled applicants or employees. For tests that are used as a part of our selection process, we confirm these tests are job-related and are validated. We have taken corrective action to remove any barriers to hiring or retaining women, people of color, or individuals with disabilities.
3. **Compensation system:** We will routinely review our compensation system, including rates of pay and bonuses, to determine whether there is any gender, race, ethnicity, or disability-based disparities. If any disparities are identified, we take prompt action to resolve the disparity. In offering employment to individuals with disabilities, we will not reduce the amount of compensation offered because of any disability income, pension, or other benefit the applicant or employee receives from another source.
4. **Personnel procedures:** We will routinely review all of our personnel procedures and processes, including selection, recruitment, referral, transfers and promotions, seniority provisions, apprenticeship programs and company-sponsored training programs and other company activities to determine if all employees or applicants are fairly considered.
5. **Any other areas that might impact the success of our Affirmative Action Program:** We continually analyze any other areas that may impact our success, such as accessibility of our facility to the available workforce, the attitude of our current workforce towards EEO, proper posting of our EEO policy and required governmental posters, proper notification of our subcontractors or vendors, and retention of records in accordance with applicable law. We take prompt action to remedy any problems in these areas through training of staff or other methods.

## **ACTION-ORIENTED PROGRAMS**

### **Selection Process**

We will evaluate our selection process using an adverse impact analysis to determine if our requirements screen out a disproportionate number of people of color, women, or individuals with disabilities. All personnel involved in the recruitment, screening, selection, promotion, disciplinary, and related processes will be carefully selected and trained to ensure that there is a commitment to the affirmative action program and its implementation.

***Schedule for Review of Job Requirements:*** We will annually review all physical and mental job requirements to ensure that these requirements do not tend to screen out qualified individuals with disabilities. We will determine whether these requirements are job-related and are consistent with business necessity and the safe performance of the job, and we will remove any physical or mental requirements that do not meet these criteria. Any job descriptions or requirements changed after review will be distributed to all relevant employees, particularly those involved in the selection process and supervision of employees.

***Pre-Employment Medical Examination:*** If we require medical examinations or inquiries as a part of our selection process, all exams or inquiries will be conducted after a conditional offer of employment. Only job-related medical examinations and inquiries will be conducted, and the results of these examinations or inquiries will not be used to screen out qualified individuals with disabilities. Information obtained in response to such inquiries or examinations will be kept confidential except that (a) supervisors and managers may be informed regarding restrictions on the work or duties of individuals with disabilities and regarding accommodations, (b) first aid and safety personnel may be informed, where and to the extent appropriate, if the condition might require emergency treatment, and (c) officials, employees, representatives, or agents of the Minnesota Department of Human Rights or local human rights agencies investigating compliance with the act or local human rights ordinances will be informed if they request such information.

### **Accommodations to Physical and Mental Limitations of Employees**

We will make reasonable accommodations to the physical and mental limitations of an employee or applicant unless such an accommodation would impose an undue hardship on the conduct of the business.

### **Recruitment of Employees**

1. All solicitation or advertisements for employees will state that applicants will receive consideration for employment regardless of their race, color, creed, religion, national origin, sex, sexual orientation, disability, age, marital status, or status with regard to public assistance. When needed, to help address underutilization, help wanted advertising will also be placed in news media oriented towards women or people of color. Copies of advertisements for employees will be kept on file for review by enforcement agencies.

2. When we place help-wanted advertisements, we will not indicate a preference, limitation, or specification based on sex, age, national origin, or other protected characteristic, unless that characteristic is a bona fide occupational qualification for a particular job. We will not allow any employment agency with which we work to express any such limitation on our behalf, and we will require that these agencies share our commitment to Equal Employment Opportunity.
3. All positions for which we post or advertise externally will be listed with State of Minnesota Workforce Centers, America's Job Bank, or similar governmental agencies.
4. We will request the Minnesota Department of Employment and Economic Development to refer qualified individual with disabilities for employment consideration under our affirmative action programs in accordance with Minnesota Administrative Rule 5000.3557.
5. As necessary to ensure that potential candidates are aware of job openings, we will contact community organizations focused on the employment of women, people of color, and individuals with disabilities (including state vocational rehabilitation agencies or facilities, sheltered workshops, college placement offices, education agencies, or labor organizations).
6. We will keep documentation of all contacts made and responses received, in connection with paragraphs 4 and 5 above, whether formal or informal. We will make every effort to give these agencies a reasonable amount of time to locate and refer applicants
7. We will carry out active recruiting programs at relevant technical schools and colleges, where applicable.
8. We will encourage existing people of color, female and disabled employees to recruit additional candidates for employment opportunities.
9. Consideration of people of color and women not currently in the workforce: We will take additional steps to encourage the employment of women, people of color and individuals with disabilities who are not currently in the workforce, such as providing part-time employment, internships, or summer employment programs.

## **Training Programs**

People of color, female and employees with disabilities will be afforded full opportunity and will be encouraged to participate in all organization sponsored educational and training programs.

We will seek the inclusion of qualified people of color, female and disabled employees in any apprenticeship program in which we participate.

## **Promotion Process**

Our promotion process has been developed and documented and only legitimate qualifications are considered in our promotion decisions. We will conduct adverse impact analyses to ensure that

women, people of color, and employees with disabilities are promoted at rates substantially similar to men, non-people of color, and individuals without disabilities.

## **Termination Process**

We use progressive discipline before terminating employees, where appropriate. All employees are made aware of our discipline process. We will conduct adverse impact analyses to ensure that women, people of color, and employees with disabilities do not leave our company at rates substantially dissimilar to those of men, non-people of color, and employees without disabilities.

## **Religion and National Origin Discrimination and Accommodation for Religious Observance and Practice**

As a part of our commitment to Equal Employment Opportunity for all, we have made a specific effort to ensure that national origin and religion are not factors in recruitment, selection, promotion, transfer, termination, or participation in training. The following activities are undertaken to ensure religion and national origin are not used as a basis for employment decisions:

1. Recruitment resources are informed of our commitment to provide equal employment opportunity without regard to national origin or religion.
2. Our employees are informed of our policy and their duty to provide equal opportunity without regard to national origin or religion.
3. Employment practices exist and are reviewed to ensure that we implement equal employment opportunity without regard to national origin or religion.
4. The religious observances and practices of our employees are accommodated, except where the requested accommodation would cause undue hardship on the conduct of our business.
5. We do not discriminate against any qualified applicant or employee because of race, color, creed, disability, age, sex, sexual orientation, marital status, or status with regard to public assistance in implementing the policy concerning non-discrimination based on national origin or religion.

## **Sex Discrimination Guidelines**

We incorporate the following commitments into this AAP to ensure that all laws related to the prohibition of discrimination based on sex are followed:

1. Employment opportunities and conditions of employment are not related to the sex of any applicant or employee. Salaries are not related to or based upon sex.
2. Women are encouraged to attend all training or development programs to facilitate their opportunities for promotion, and to apply for all positions for which they are qualified.

3. We do not deny employment to women or men with young children and do not penalize, in conditions of employment, women or men who require time away from work for parental leave.
4. Appropriate physical facilities are provided to both sexes.

## **Prevention of Harassment and Discrimination**

Our company has developed policies prohibiting the harassment of or discrimination against any employee because of any characteristic protected under civil rights laws. Senior management will distribute these policies routinely to current employees and incorporate these policies as a part of new employee orientation. Employees are made aware of contact persons to report any violation of these policies.

## **ANTI-HARASSMENT POLICY**

*From the Catholic Charities Employee Handbook:*

### **SEXUAL AND OTHER HARASSMENT**

We are committed to providing a work environment free from unlawful harassment based on protected class status, including race, creed, color, religion, sex, national origin, age, marital or familial status, disability, status with regard to public assistance, membership or activity in a local commission, sexual or affectional preference or orientation, genetic history, veterans status or any other class status protected pursuant to applicable local, state or federal laws. We prohibit conduct that denigrates or shows hostility or aversion toward an individual because of his or her protected class status and that has the purpose or effect of creating an intimidating, hostile or offensive work environment; has the purpose or effect of unreasonably interfering with an individual's work performance; or otherwise adversely affects an individual's employment opportunities. Depending on the circumstances, prohibited harassment may include, without limitation, slurs, graphic material, or threatening or intimidating acts, regardless of whether they purport to be jokes, horseplay, hazing or pranks. Any employee found to have violated this policy is subject to disciplinary action, which may include termination of employment. All employees are expected to live Catholic Charities' values every day and to treat co-workers, volunteers and clients with dignity and respect.

### **Sexual Harassment Defined**

Sexual harassment is one form of harassment and can involve members of the same or opposite gender. Sexual harassment includes unwelcome sexual advances, requests for sexual favor, and other verbal or physical conduct of a sexual nature when:

- Submission to the conduct is made either explicitly or implicitly a term or condition of employment;
- Submission to or rejection of the conduct is used as a factor in employment decisions affecting an individual; or
- The conduct unreasonably interferes with an individual's employment or creates an intimidating, hostile or offensive employment environment.

Examples of conduct that may constitute sexual harassment, depending on the circumstances, include without limitation the following:

- Repeated and unwelcome suggestions regarding, or invitations to, social engagements or social events;
- Any indication, expressed or implied, that any aspect of employment conditions or personal safety depends or may depend on the granting of sexual favors or on a willingness to accept or tolerate conduct or communication of a sexual nature;
- Unwelcome or coerced physical proximity or physical contact, which is of a sexual nature or sexually motivated;
- The creation of an intimidating, hostile or offensive atmosphere, through conduct or communications of a sexual nature, including dirty jokes and graphic or suggestive comments about an individual's dress or body; or
- Inappropriate remarks of a sexual nature.

## **Reporting Procedure**

Catholic Charities does not tolerate retaliation or intimidation directed toward anyone who makes a complaint of harassment or who participates in an investigation of a complaint. If you believe that you have been harassed by anyone you encounter in the course of your work (for example, by a fellow employee or supervisor, consultant, vendor, volunteer or client), or that there has been a violation of this policy, immediately report the conduct to your supervisor or department head, a Human Resources representative or the Compliance Officer.

Anyone, including a supervisor, who receives a report or complaint of harassment, must immediately report it to the Human Resources Department at 612-204-8500. If a report or complaint involves the Senior Director of Human Resources or a Human Resources representative, the individual receiving the report or complaint should immediately report it to the Compliance Officer at 612-204-8500 or [CorporateComplianceOffice@cctwincities.org](mailto:CorporateComplianceOffice@cctwincities.org).

Reports may also be made through the anonymous 24hour InTouch Hotline 1-(877)-767-7781; however, anonymous reports without sufficient information to allow for an appropriate investigation, may not be acted upon.

If the harassment or policy violation reoccurs, immediately report the reoccurrence to any of the resources listed above. You should also use the reporting procedure described above if you believe you have been subjected to prohibited retaliation or intimidation. Catholic Charities does not tolerate retaliation or intimidation directed toward anyone who makes a complaint of harassment or who participates in an investigation of a complaint.

## **Investigation and Responsive Action**

Complaints of harassment made to any of the individuals listed above will be promptly investigated by the Human Resources Generalist, unless another person is more appropriate. Confidentiality will be maintained to the extent practical and appropriate under the



circumstances, understanding that some persons will need to be advised of the complaint in order to conduct an investigation and facilitate an appropriate response.

Because the circumstances of every complaint or report of harassment are different, Catholic Charities will use discretion and flexibility in conducting an appropriate investigation of and formulating an appropriate response to each complaint or report, consistent with our policy against harassment.

If an investigation indicates that a violation of this policy may have occurred, timely and appropriate action will be taken. A person found to have violated this policy may be subject to a broad range of consequences, including termination of employment.

The company will investigate and attempt to resolve your complaint promptly. If, for any reason, you believe this has not occurred within a reasonable period of time, refer the matter to a member of senior management up to and including the CEO of Catholic Charities of the Archdiocese of St Paul and Minneapolis.

## **PROBLEM RESOLUTION POLICY**

In any organization, dissatisfaction may arise because an employee does not know, understand, or agree with certain policy interpretations or management decisions. Such dissatisfactions are commonly referred to as grievances. At Catholic Charities of the Archdiocese of St Paul and Minneapolis, we believe that if any employee has a grievance concerning his/her wages, hours of work, or other terms or conditions of employment, the matter should receive attention from management.

An employee who feels aggrieved is urged to take the matter up immediately with his/her supervisor. Your supervisor is required to investigate your grievance and provide you a response or decision within a reasonable period of time. This investigation may consist of, but is not limited to, gathering information from other employees involved, reviewing company policy, and any other action necessary to understand the matter completely.

If you are not satisfied with the response/decision from your immediate supervisor, you are encouraged to notify the next level of management in writing. This next level of supervision will have a reasonable period of time in which to investigate the matter and respond to you in writing.

If, after these steps are taken, you believe inadequate action has been taken to resolve your complaint, contact the Human Resources Generalist of your program/department. It is the policy of this organization to respond to any and all complaints, and to take immediate and necessary actions to resolve the issue.

There will be no adverse action taken against a complaining employee as a result of making the complaint, regardless of the outcome of the investigation.

If you have a problem which is more specifically addressed by the Anti-Harassment Policy, please follow the procedure described in the Anti-Harassment Policy section.