

Non-discrimination Policy

Adopted April 25th, 2011

This policy expresses the commitment of Mt. Baker Community Club (MBCC) to maintaining an environment free from discrimination, including sexual harassment. This policy applies to all MBCC employees, contractors, volunteers and Board members.

This policy prohibits discrimination on the basis of race, color, age, sex, marital status, sexual orientation, gender identity or expression, creed, religion, political ideology, ancestry, national origin, or the presence of any sensory, mental or physical handicap. Discriminatory harassment is one form of discrimination. Under this policy, discriminatory harassment is identified as conduct toward a particular individual, individuals, or groups on the basis of a protected status that is sufficiently severe or pervasive that it has the purpose or effect of:

- Creating an intimidating, hostile, or offensive work environment for individuals or groups; or
- Unreasonably interfering with the work, personal security, or participation in any MBCC-sponsored activity of individuals or groups.

Sexual harassment is a form of discrimination. Sexual harassment encompasses unwelcome sexual advances, unwelcome requests for sexual favors or requests for sexual favors in exchange for some benefit, and/or unwelcome verbal or physical conduct of a sexual nature by a male or a female. Sexual harassment occurs when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of any individual's employment; or
- Submission to or rejection of such behavior by an individual is used as the basis for employment decisions affecting the individual; or
- A behavior is sufficiently severe and pervasive to interfere with any individual's work performance, or create an intimidating, hostile, or offensive work environment.

Examples of behaviors that may rise to the level of sexual harassment and, therefore, are prohibited by this policy include but are not limited to the following:

1. Physical assault;
2. Direct or implied threats that submission to sexual advances will be a condition of employment, work status, promotion, or letters of recommendation;
3. A pattern of behaviors that is unwelcome and severe or pervasive, resulting in unreasonable interference with the work environment or creation of a hostile, intimidating or offensive work environment, and may include but is not limited to the following:
 - Comments of a sexual nature;
 - Sexually explicit statements, questions, jokes, or anecdotes;

- Unnecessary or undesirable touching, patting, hugging, kissing, or brushing against an individual's body;
- Remarks of a sexual nature about an individual's clothing, body, or speculations about previous sexual experiences;
- Persistent, unwanted attempts to change a professional relationship to an amorous relationship;
- Subtle propositions for sexual activity or direct propositions of a sexual nature; and/or
- Uninvited letters, e-mails, telephone calls, or other correspondence referring to or depicting sexual activities.

Reporting Incidents – Employees, Contractors and Volunteers

Employees, contractors and volunteers should first discuss any incident that violates this policy with their immediate supervisor. If, after speaking with his or her supervisor, an individual continues to have reasonable grounds to believe the concern is valid, or if the individual is uncomfortable speaking directly with his or her supervisor, the individual should report the incident to any two members of MBCC's Executive Committee. If the incident was reported orally to these Executive Committee members, they shall, with assistance from the reporting individual, document the incident in writing. The two Executive Committee members shall promptly report the incident to the Chair of the Board. The Executive Committee has the specific and exclusive responsibility to investigate all incidents, unless the incident relates to the entire Executive Committee or the Chair of the Board. If the two Executive Committee members, for any reason, do not promptly forward the incident to the Chair of the Board, the reporting individual should directly report the incident to the Chair of the Board. Contact information for members of the Executive Committee, including the Chair of the Board, shall be made available to every MBCC employee. Incidents may also be submitted anonymously. Such anonymous incident reports should be in writing and sent directly to the Chair of the Board.

If the incident relates to an individual's immediate supervisor, the individual shall report the incident directly to two members of the Executive Committee, as set forth above. If the incident relates to the Chair of the Board, the complaint should be reported to a member of the Executive Committee of the Board. If the incident relates to all or a majority of the Executive Committee, the individual shall report the incident to a Board member not part of the Executive Committee. In the event an incident relating to all or a majority of the Executive Committee is reported to such a Board member, that Board member shall work with the Chair of the Governance Committee to appoint a committee to investigate the incident and report back to the full Board of Directors.

Reporting Incidents – Board Members

Board members shall report any incident in writing directly to the Chair of the Board. Contact information for the Chair of the Board may be obtained from the Treasurer, a MBCC staff member, or MBCC board member. If the incident relates to the Chair of the Board, the incident shall be reported to any other member of the Executive Committee. In the event the incident

relates to all or a majority of the Executive Committee, the incident shall be reported to the Chair of the Board.

Handling of Reported Incidents

The Executive Committee shall address all reported incidents. The Chair of the Board shall immediately notify the Executive Committee of any such report. If a reported incident relates to any member of the Executive Committee, any such person shall not be informed of the report unless the Executive Committee needs to disclose the incident to complete its investigation and/or action is taken by the Board of Directors. The Chair of the Board shall notify the reporting individual and acknowledge receipt of the report within five business days, if possible. It will not be possible to acknowledge receipt of anonymously submitted incident reports.

All reports will be promptly investigated by the Executive Committee, and appropriate corrective action will be recommended to the Board of Directors, if warranted by the investigation. In addition, action taken must include a conclusion and/or follow-up with the reporting individual for complete closure of the reported incident. It will not be possible for a follow-up for a reported incident submitted anonymously.

The Executive Committee has the authority to retain outside legal counsel, private investigators, or any other resource deemed necessary to conduct a full and complete investigation of the allegations.

Acting in Good Faith

Any person reporting an incident must act in good faith and have reasonable grounds for believing that the information disclosed indicates that this policy has been violated. The act of making allegations that were made maliciously, recklessly, or with knowledge that the allegations are false, will be viewed as a serious offense and may result in discipline, up to and including termination of employment or contract. Such conduct may also give rise to other actions, including civil lawsuits.

Confidentiality

Reports of Concerns, and investigations pertaining thereto, shall be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

Disclosure of reported incidents to individuals not involved in the investigation will be viewed as a serious disciplinary offense and may result in discipline, up to and including termination of employment. Such conduct may also give rise to other actions, including civil lawsuits.