



NON-DISCRIMINATION POLICY

Policy

The Institute for Childhood Preparedness (ICP) maintains a working and training environment free of any discrimination. The culture at ICP is conducive to learning and working where all people are treated with respect and dignity.

Purpose

The purpose of this policy is to maintain compliance with local, state and federal regulations. Additionally, the purpose of this policy is to ensure ICP maintains a high level of professional conduct throughout the ICP organization.

Responsibility

The Institute for Childhood Preparedness Executive Director oversees adherence to this policy.

Processes and Procedures

Equal Opportunity

ICP is an equal opportunity employer and is committed to providing a work environment that is free of discrimination and harassment. ICP prohibits illegal discrimination and harassment, as well as retaliation against anyone who reports discrimination or harassment. This policy applies to all ICP job candidates, employees, independent contractors, clients and members. This commitment encompasses all aspects of the employer-employee relationship, including but not limited to recruitment, pay, benefits, assignments, promotion, demotion, performance reviews, and termination. ICP promotes equal employment opportunities without regard to race, color, religion, national origin, age, sex, sexual orientation, gender identity, disability status, military or veteran status, genetic information, child or spousal support withholding, or any other characteristic protected by law.

ICP affirms its commitment to maintain a diverse workforce reflective of the communities in which we operate, maintain a business culture that recognizes the contributions and interests of diverse cultural and social groups, and maximize employee efforts by understanding individual differences and perspectives.

Discriminatory Harassment

ICP prohibits harassment based upon all legally protected categories, as noted above. This includes harassing conduct that (i) adversely affects tangible work benefits, (ii) interferes unreasonably with an individual's job performance, (iii) involves severe and pervasive conduct that creates an intimidating or hostile work environment,

or (iv) otherwise violates any applicable legal standard. It can consist of any type of unwelcome derogatory or humiliating conduct directed at an individual or group of individuals on the basis of any protected category.

Patterns of behavior and practices that may amount to discriminatory harassment could include, but are not limited to:

- 1) Verbal comments, *e.g.*, offensive epithets, jokes, insults or slurs.
- 2) Visual conduct, *e.g.*, inappropriate posters, photos, cartoons, or screen savers.
- 3) Written material, *e.g.*, threatening or offensive letters or notes.
- 4) Electronic communication, *e.g.*, verbally or visually harassing emails or ICP-sponsored social media postings.
- 5) Physical conduct, *e.g.*, assaults, obstructing movement, or other physical interference or disruption of an individual's normal work environment.

Prohibitions

The Institute for Childhood Preparedness does not restrict access to products, programs and services, or treatment of any individual accessing its products, programs and services based on discrimination of gender, race, religion, ethnicity, sexual orientation, disability or age. This policy includes prohibitions of harassment of program participants, customers, and employees, *i.e.*, racial harassment, sexual harassment, and retaliation for filing complaints of discrimination. Speakers, presenters and external experts and consultants involved in developing, administering, and delivering ICP education sessions, training courses, workshops or presentations at any ICP event are expected to maintain a high standard of professionalism and are not to discriminate or make discriminatory remarks based on gender, race, religion, ethnicity, sexual orientation, disability or age.

ICP ensure strict adherence to all federal, state and local harassment laws.

Communication

The Institute for Childhood Preparedness publicly posts their Non-Discrimination Policy on their website (childhoodpreparedness.org) for all learners, trainers, employees and anyone affiliated with ICP to access. A written format of the policy is also available upon request by contacting info@childhoodpreparedness.org.

Additionally, all instructors, trainers, contractors, developers, employees and any persons affiliated with the Institute for Childhood Preparedness must acknowledge said policy through completion and submission of the signed Policy Acknowledgement (provided below). This policy is provided electronically at the start of the relationship with ICP and provided yearly via email.

Acknowledgement

All current employees, contractors, developers and trainers must submit the Policy Acknowledgement (provided below) within 30 days of engagement with the Institute for Childhood Preparedness. If the Policy Acknowledgement is not received, the employee, contractor, developer or trainer will receive a written notice and have 10 days to submit the Policy Acknowledgement. If it is not received at the 40 day mark, the employee, contractor or trainer will be terminated from contract with the Institute for Childhood Preparedness.

Additionally, all employees, contractors, developer and trainers must have a current signed Policy Acknowledgement submitted on an annual basis. This occurs each January, with all forms due before January 30th.

Acceptance and Retention

The Institute for Childhood Preparedness Executive Director directly receives all form submission via info@childhoodpreparedness.org. The Executive Director is responsible for ensuring all Policy Acknowledgments

are received timely and are current. The Executive Director is also responsible for electronic retention of all Policy Acknowledgements.

Complaints and Whistleblowers

ICP is committed to maintaining a workplace where employees are encouraged to report suspected violations of law or official policies, and cooperate in investigations without fear of retaliation. ICP has established the following procedures to be followed when reporting violations.

Suspected violations of law or official ICP policies (including, but not limited to, alleged discrimination, harassment, violation of other labor and employment laws, antitrust violations, fraud, or misappropriation of financial resources or property) should be reported immediately to the Executive Director. This report may be made electronically through email, via telephone or via in-person meeting.

ICP receives funding through federal awards. Evidence of gross mismanagement of federal funds, a gross waste of federal funds, an abuse of authority relating to a federal award, a substantial and specific danger to public health or safety, or violation of law, rule or regulation related to federal award must be reported directly under this policy and may be reported to the responsible federal agency.

Supervisors receiving information about alleged policy or legal violations must notify the Executive Director immediately. Any supervisor who fails to do so will be subject to discipline, up to and including termination.

The action taken by ICP in response to a complaint will depend on the nature of the complaint. All complaints will be investigated promptly and impartially. The Executive Director will conduct the investigation and will attempt to complete the investigation and report its results within 30 days. Depending on the nature and complexity of the complaint, the Executive Director will determine what type of an investigation will be conducted and to determine the form that such an investigation should take. Some complaints may be resolved without the need for an extended investigation. ICP reserves the right to take interim action regarding a complaint pending a complete investigation, including but not limited to, a leave of absence, suspension, transfer of the employee who reportedly violated ICP policy or the law. Individuals who submit complaints under this procedure are not responsible for investigating the activity, or for determining fault or corrective measures.

All complaints will be addressed in a manner intended to protect the identity of any whistleblower, to the extent reasonable and appropriate under the circumstances and applicable laws, and with the understanding that details of complaints may need to be shared with others in order to investigate such complaints properly, and to allow the accused the opportunity to defend him/herself. Anonymously submitted complaints are discouraged, but will be considered to the extent possible based on the information provided. Any employee found by ICP to have violated the law or an official ICP policy will be subject to discipline, up to and including termination.

ICP expressly prohibits any form of retaliation, such as harassment, intimidation or adverse employment actions, against employees who raise suspected violations of law or official ICP policies, or cooperate in ICP inquiries or investigations. Any employee who engages in retaliation will be subject to discipline, up to and including termination.

Any employee who in good faith believes that he or she has been subjected to any form of retaliation as a result of reporting a suspected violation of law or official ICP policy should report such incident to the Executive Director immediately. Supervisors who receive information about possible retaliation must inform the Executive Director immediately. Any supervisor who fails to do so will be subject to discipline, up to and including termination.

Furthermore, any employee found to have abused this complaint procedure, for example, by knowingly making false reports of violations or false statements during the investigation of a complaint, also will be subject to discipline, up to and including termination.

Notice

In addition to being included in writing in this policy, posted on the ICP website and made available in writing upon request, this process is also disclosed at the beginning of all learning events. A slide containing this information will be shown and participants will receive a verbal explanation of the policy and how to report any concerns. The email address info@childhoodpreparedness.org will be displayed on the slide and the verbal explanation will also indicate that this policy is posted on the ICP website.

Revision History

Revision Number	Revision Date	Author	Approved by	Effective Date
1	December 18, 2018	A Roszak	A Roszak	January 1 2019
2	December 12, 2019	A Roszak	A Roszak	January 1 2020
3	November 16, 2020	A Roszak / A Lowry	A Roszak	December 1, 2020

Policy Acknowledgement

I, _____ (Print Name), have read and understand the Anti-Discrimination Policy. I agree to abide by this policy.

Employee/Contractor/Trainer Signature

Date

Please print this form, sign and return to info@childhoodpreparedness.org.