

## Policy on Equal Employment Opportunity

As an organization, we are committed to ensuring equal employment opportunity. All employment decisions, policies and practices are in accordance with federal, state and local anti-discrimination laws, to the extent applicable. However, as a limited exception to these general principals, in some instances, an individual's gender, membership in the Church and/or compliance with Church doctrine may be a bona fide qualification of or otherwise legitimate requirement for a position, and may be taken into consideration in accordance with applicable law.

We will not engage in or tolerate unlawful discrimination (including any form of unlawful harassment) on account of a person's sex, age, religion, creed, race, color, national origin, ancestry, citizenship, military status, veteran status, handicap or disability or any other protected group or status. For example, and by way of illustration only, the Church will not unlawfully consider an individual's membership in any protected group as defined above with regard to interviewing, hiring, compensation, benefits, training, assignments, evaluations, coaching, promotions, discipline, discharge and layoffs. However, as a limited exception to these general principals, in some instances, membership in the Church and compliance with Church doctrine may be a requirement of the position, and may be taken into consideration in accordance with applicable law.

Subject to the limited exception identified above, as well as applicable law,<sup>1</sup> this policy applies to all teachers, clergy, managers, supervisors, employees and applicants. To the extent applicable, such individuals are both protected under and subject to this policy.

## Policy Prohibiting Sexual Harassment

Sexual harassment is a form of sex discrimination which we will not tolerate.

The following behaviors are prohibited, whether by a man or a woman and whether directed at a man or a woman:

1. To threaten or insinuate, directly or implicitly, that a subordinate must submit to sexual advances or provide sexual favors as a condition of employment, continued employment or to receive any benefit of employment; similarly any threat or insinuation that refusal to submit to sexual advances or to provide sexual favors will affect adversely the subordinate's employment, continued employment or receiving any benefit of employment is prohibited.
2. To make any employment decision or take any employment action based on a person's submission or refusal to submit to sexual advances.
3. To engage in unwelcome sexually-oriented or otherwise hostile conduct which interferes unreasonably with another person's work performance or creates an intimidating, hostile, abusive or offensive working environment. Whether something is unreasonable is determined from the perspective of the person experiencing the conduct (not the person engaged in it).

The following are inappropriate, and as such, prohibited, regardless of whether they are illegal: sexual or suggestive pictures, photos, cartoons, emails, Internet web sites, jokes, slurs, profanity, nicknames, conversations<sup>2</sup>, questions, innuendo (verbal and non-verbal), objects and symbols; frequent and/or

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<sup>1</sup> As a religious institution, the Church has a legitimate interest in determining who will preach its belief, teach its faith and carry out its mission. Therefore, in accordance with applicable law, the Church reserves the right to make employment decisions, policies and practices consistent with this legitimate interest.

<sup>2</sup> In educational instruction as well as religious counseling, there may be times when sexuality is an appropriate topic of conversation. In these situations, the discussions of sexuality and related issues: (1) should be

inappropriate comments on appearance; repeated requests for dates<sup>3</sup>; excessive and/or inappropriate touch; and other inappropriate behaviors and/or communications of a sexual, suggestive or biased nature.

It is no defense for inappropriate behavior that there was no bad intent, that it was only a joke, or that it was not directed at any particular person.

These prohibitions apply not only to oral and written communications, but also to email, voicemail and Internet communications and searches and other technology-assisted communications.

These prohibitions also may extend to postings on personal blogs and other forms of social networking if seen by or containing messages about colleagues or others with whom we work or serve.

The prohibitions on inappropriate behavior described above apply not only in the workplace itself but also in all other work-related settings, such as business trips and Church-related social functions.

If you have any question as to whether something may be inappropriate, don't do it.

## **Harassment on Account of/with Regard to Any Other Protected Group**

Harassment based on any other protected status (for example, **age, race, national origin or disability**) is equally prohibited and will not be tolerated.

The following are inappropriate, and as such, prohibited, regardless of whether they are illegal: pictures, photos, cartoons, emails, Internet web sites, jokes, slurs, epithets, nicknames, conversations, questions, objects, symbols, imitations and other communications/behaviors which reflect negatively upon, stereotype or disparage any protected group (for example, any race, gender, ethnic group, age, religion or disability).

It is no defense for inappropriate behavior that there was no bad intent, that it was only a joke or that it was not directed at any particular person.

These prohibitions apply not only to oral and written communications, but also to email, voicemail and Internet communications and searches and other technology-assisted communications.

The prohibitions also may extend to postings on personal blogs and other forms of social networking if seen by or contain messages about colleagues or others with whom we work or serve.

The prohibitions on inappropriate behavior described above apply not only in the workplace itself but also in all other work-related settings, such as business trips and Church-related social functions.

If you have any question as to whether something may be inappropriate, don't do it.

## **Reasonable Accommodations**

Upon request we will make reasonable accommodations for qualified individuals with disabilities or with regard to an employee's religious observances, practices and beliefs if such accommodations do not

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limited to the educational or counseling purpose; (2) should be professional without being excessive in terms of focus or explicitness; and (3) should not include profanity, offensive wording or insinuation or suggestive, explicit or inappropriate humor.

<sup>3</sup> Although not prohibited by law, the Church discourages dating (or attempts at dating) between: (1) a supervisor and a subordinate; and (2) a teacher and a student. The Church also prohibits dating or attempts at dating between a married employee (even if legally separated) and any other person, employee or non-employee.

impose an undue hardship upon the organization. If you need an accommodation for religious or medical reasons, please speak with the Director of Human Resources.

## Policy Prohibiting Retaliation

We will neither engage in nor tolerate unlawful retaliation of any kind against any person who makes a complaint of unlawful discrimination, harassment or retaliation, serves as a witness or otherwise participates in the investigation process. We also will neither engage in nor tolerate unlawful retaliation against someone who is associated with any person who makes a complaint. As with all other provisions of this Policy, all employees are both protected by and subject to this provision.

Prohibited retaliation includes adverse tangible employment actions, such as denial of a raise or promotion. It also may include, in some circumstances, material changes in the terms and conditions of employment, such as work assignments, if the changes result from a retaliatory motive. Prohibited retaliation also may include adverse actions outside the workplace, such as trying to exclude an employee from membership in an outside professional organization because of a complaint he or she made at work.

It is no defense for retaliation by any person (clergy, manager, supervisor, etc.) that the complaint did not have legal merit. Generally speaking, and subject to applicable law, so long as an individual acts in good faith in making a complaint alleging unlawful discrimination, harassment or retaliation, serving as a witness, or otherwise participating in the investigation process, no adverse action can be taken against him or her because of those actions.

Prohibited retaliation will be handled in the same manner, and employees will be subject to disciplinary/corrective action to the same degree, as with any other violation of this Policy.

## Discrimination, Retaliation or Harassment Advanced By Non-Employees

The prohibitions against unlawful discrimination, retaliation and harassment set forth in this Policy apply not only to our employees but also to non-employees (for example, students, Church members and their families, vendors and the general public) with whom our employees come into contact in connection with their employment with us. Consequently, if you feel discriminated or retaliated against or harassed (sexually or otherwise) by a non-employee in connection with your employment, you should use the procedure set forth below. If your complaint involves a student, it will be referred to a special committee designated to handle such complaints. The prohibitions against unlawful discrimination, retaliation and harassment set forth in this Policy also apply to your conduct relative to non-employees with whom you interact in the course of your employment with us.

## What to Do If You Feel You Have Been Subjected to Discrimination, Harassment or Retaliation

If you believe that you or anyone else may have been unlawfully discriminated against, harassed or retaliated against, or subject to any inappropriate conduct prohibited by this **Equal Employment Opportunity Policy**, by any clergy, manager, supervisor, co-worker, agent or non-employee, you should report the alleged violation immediately to any of the following:

- Karen Stoeller, Director of Human Resources, General Church of the New Jerusalem, who can be reached at: 267-502-4661 or [karen.stoeller@anc-gc.org](mailto:karen.stoeller@anc-gc.org).
- Joe Weiss, Director of Human Resources, Academy of the New Church, who can be reached at: 267-502-2632 or [joe.weiss@anc-gc.org](mailto:joe.weiss@anc-gc.org).
- Muriel Allen Brisbon, Director of Human Resources, Bryn Athyn College, who can be reached at 267-502-6038 or [muriel.brisbon@brynathyn.edu](mailto:muriel.brisbon@brynathyn.edu)



You should also consult with one of these individuals if you believe that a reasonable accommodation that you requested was not, but should have been, made.

If you are a clergy, manager, or supervisor, and anyone complains to you that they believe they or anyone else may have been subject to unlawful discrimination, harassment, or retaliation, you must report this by calling one of the Directors of Human Resources, Karen Stoeller at 267-502-4661 or Joe Weiss at 215-938-2632. Do not investigate the complaint on your own. If you are not sure whether you have a duty to report, play it safe and report.

All complaints will be investigated promptly, and the existence and nature of your complaint will be disclosed only to the extent necessary to make a prompt and thorough investigation or as may be necessary to take appropriate corrective measures.

Further, we will not tolerate any coercion, retaliation, intimidation or harassment directed against any employee who registers a complaint, serves as a witness on behalf of another employee, or otherwise participates in the investigation process.

If you are not entirely satisfied with how your complaint has been handled initially by any of the persons identified above, for whatever reason, please notify **immediately, in writing**, the Bishop of the General Church of the New Jerusalem that you wish to appeal your complaint. Your appeal should be in writing to help ensure that the person you contact is clear that you wish to appeal. While we encourage you to be detailed, it is sufficient to say "I wish to appeal my EEO complaint." Address your correspondence to:

The Executive Bishop / Chancellor of the Academy  
General Church of the New Jerusalem  
Cairncrest  
1100 Cathedral Road  
Post Office Box 743  
Bryn Athyn, Pennsylvania 19009

## **Sanctions for Violations of Our Equal Employment Opportunity Policy**

Subject to applicable law, any clergy, manager, supervisor, employee, agent or non-employee who, after appropriate investigation, has been found to have unlawfully discriminated against, harassed or retaliated against another person or to have engaged in inappropriate and/or improper conduct (even if not unlawful) inconsistent with this Policy will be subject to appropriate disciplinary and/or corrective action, up to and including termination of his or her employment or other relationship with the Church.

Exempt and non-exempt employees who violate this Policy also may be suspended without pay. Exempt employees will be suspended in full-day increments only.