

MASSACHUSETTS HOUSING PARTNERSHIP

EMPLOYEE STANDARDS & POLICIES

These rules have been implemented so that all employees know what their responsibilities are in terms of conduct on the job. If you have any questions regarding these rules or any disciplinary action, be sure to discuss them with your manager or the Chief Financial & Administrative Officer. Although much of this section is designed to provide an understanding of the workplace rules of conduct and the ramifications for violating those rules, nothing contained in this section in any way restricts, waives, or revokes the "at-will" relationship between you and MHP. In other words, although this section is a guide, circumstances may warrant that steps be taken outside of these policies.

Alcohol and Drug Policy

MHP firmly believes that the use of drugs and misuse of legal drugs, including alcohol, is a source of danger in the workplace and a threat to the goal of maintaining a productive and safe work environment.

In accordance with the Federal Drug-Free Workplace Act, the use, sale or possession of narcotics, illegal drugs or controlled substances while on the job or on MHP property is prohibited and an offense warranting disciplinary action, up to and including termination.

Employees who are under the influence of alcohol, either on the job or when reporting for work, or who possess or consume alcohol during work hours, have the potential for interfering with their own as well as their co-workers' safe and efficient job performance. Such conditions will be the basis for disciplinary action, up to and including termination of employment.

Employees are expected to follow the directions of their health care provider concerning prescription medications, and must immediately notify their supervisor if any prescription drug is likely to have an impact on job performance.

MHP is committed to the treatment and rehabilitation of employees with alcohol and controlled substance misuse problems, and encourages employees to come forward voluntarily and seek assistance for those problems. An Employee Assistance Program (EAP) is available as a resource through your health insurance with GIC. The EAP can provide confidential assistance with stress management, substance abuse, mental health, and other workplace issues. More information can be found by pressing CTRL+click on the following link, [EAP](#), or by calling 1-888-610-9039.

Attendance and Punctuality

Understanding your job responsibilities is of utmost importance and, to fulfill this obligation, punctuality and attendance are a condition of continued employment.

Absences that are excessive, either in duration or frequency, unexcused absences, unauthorized departures from work, and/or unreported absences may result in loss of pay and disciplinary action, up to and including immediate termination.

1. You are expected to report for work regularly and punctually.
2. If you are going to be late or absent for any reason, you must notify your supervisor and the Receptionist within one (1) hour prior to normal starting time.
3. You are required to notify your supervisor for each subsequent day of absence. Failure to provide notification may be cause for disciplinary action up to and including immediate termination.
4. If you are absent for three (3) consecutive days without proper notification to your supervisor or the HR Administrative Assistant you may be considered to have voluntarily terminated your employment. You must make every reasonable attempt to speak directly to your supervisor, the receptionist, or the HR Administrative Assistant before leaving a voicemail message.
5. A health related absence may require a health care provider's certificate that you are fit to return to work. Ordinarily, any absence due to illness that extends beyond three (3) days requires this certificate.

6. When you know in advance that there will be an unavoidable absence or tardiness, you must make arrangements with your supervisor. However, even pre-arranged absences will become part of your attendance record and may be considered when evaluating your overall record.

Bulletin Boards

Please be aware that MHP uses bulletin boards to communicate important MHP information such as general notices of MHP policy, directives, various labor laws, and safety rules. Each employee has the responsibility to read the information that is posted. Employees are not permitted to post unauthorized materials on bulletin boards. If you are in doubt as to whether the information you wish to post is authorized, ask your supervisor for guidance.

Confidential and Proprietary Information

Confidentiality is an extremely important aspect of employment and is established to protect the privacy rights of clients, customers and office business. It is important that you do not discuss clients, customers or office business with competitors or any other employers upon leaving employment with MHP except in the performance of official duties or with specific authorization to do so. MHP is subject to M.G.L.A 66A, the Fair Information Practices Act, if the agency, or an employee thereof, becomes a "holder of "personal data".

The protection of confidential business information is vital to the interests and the success of MHP. Such information includes, but is not limited to, the following examples: personnel file information, customer lists, financial information, marketing plans and strategies, business plans, medical records, bids and quotations, pending proposals, purchase orders (old or new), contracts, studies, market share information, credit reports, pricing data, blank checks, borrower information, and meeting notes.

MHP employees must be responsible for securing all confidential information. This may mean putting sensitive information in locked drawers, password protecting documents and computers, shredding outdated documents, etc. All employees must be careful in giving access to sensitive information. Passwords and security codes should not be shared. Information should only be shared with those individuals who have a legitimate MHP business need to know.

Employees who improperly use or disclose trade secrets or confidential business information will be subject to disciplinary action, up to and including immediate termination of employment. Legal action, even if the employee does not actually benefit from the disclosed information, may also result. If you are ever in doubt whether information is of a confidential or proprietary nature, please don't hesitate to ask your supervisor, the HR Administrative Assistant, or MHP in-house counsel.

This policy is not intended, and should not be construed, to limit or prevent an employee from exercising rights under the National Labor Relations Act.

Conflicts of Interest

All employees must comply with the Conflicts of Interest Law (Chapter 268A of the General Laws) as it pertains to employees of the Commonwealth. This law requires, among other things, that:

- No employee shall request or receive compensation in relation to any matter in which MHP has a direct and substantial interest,
- No employee shall participate in a particular matter being considered by MHP in which he or she or his or her immediate family member or partner has a financial interest, and
- No employee shall have a financial interest in a contract in which the Commonwealth or MHP is an interested party.

Due to the broad scope and complexity of the conflict of interest statute, employees are encouraged to report any potential conflict to the Deputy Director & General Counsel as soon as they have knowledge of it. Employees may also seek advice directly from the State Ethics Commission by calling 617-727-0060.

The Executive Director, Deputy Director & General Counsel and certain managers are designated policy-making positions for MHP. The persons holding these positions are subject to the financial disclosure requirements of Chapter 268A of the General Laws and must annually file a Statement of Financial Interest with the State Ethics Commission. For more information, please visit the State Ethics Commission website at <http://www.mass.gov/ethics/>.

Dress Code

MHP's dress code is "business casual". All employees of MHP are expected to dress and groom in accordance with accepted professional business standards.

Employees who do not have scheduled external meetings are welcome to wear casual clothes, including jeans on Fridays.

Drug-free Workplace

It is MHP's policy to provide a drug-free workplace for all of its employees in accordance with the provisions of the United States Drug-Free Workplace Act of 1988 (PL 100-690 or 41 U.S.C.S. 701-707). Accordingly, every employee is hereby notified that the manufacture, distribution, dispensation, possession or use of a controlled substance is prohibited when in the employ of MHP.

Violation of Policy. Violation of this policy shall result in a disciplinary action, including, but not limited to, suspension and or termination.

Procedures for Reporting Violations of Policy. MHP establishes, as a condition of employment, that each employee must abide by the drug-free workplace policy; and that each employee must notify MHP, through their supervisor, within five (5) days of any conviction for violation of any federal or state criminal drug law in the workplace.

MHP will make a good faith effort to maintain a drug-free workplace through implementation of this policy statement.

Employee Files

Confidentiality. MHP maintains a personnel file for each employee and it is the property of MHP. Only those individuals authorized to view an employee file will be allowed to do so.

All inquiries by outside parties about present and former employees are to be directed to the HR Administrative Assistant. The HR Administrative Assistant will verify the identity of the inquirer and disclose the position held and dates of employment.

Employee Access. MHP abides by the law with respect to disclosure of personnel files. Employees who wish to review or copy their personnel file should contact the HR Administrative Assistant. Upon such request, employees may review/copy their employee file as soon as practical and within not more than five business days in a designated space during normal business hours. In addition, an employee who requests a copy of their personnel file will receive it within five business days.

Employment Classifications

Regular, full-time employees are those employees who are regularly scheduled to work MHP's full-time schedule, thirty-seven and one half (37.5) hours per week or more, and who maintain continuous regular employment status. Generally, regular, full-time employees are eligible for all employee benefits, holiday pay and group insurance, subject to the terms, conditions, and limitations of each benefit program.

Part-time employees are those employees who are regularly scheduled to work less than thirty-seven and one half (37.5) hours per week. Part-time employees participate in all legally mandated benefit programs, and are eligible for MHP's other benefit programs on a pro-rated basis, except where otherwise noted.

Temporary/Interns/Contract Employees are those employees who are hired as interim replacements to temporarily supplement the work force or to assist in the completion of a specified project. Employment assignments in this category are of a limited duration. Employment beyond any initially stated period does not in any way imply a change in employment status. Temporary employees retain that status until notified of a change in writing. While temporary employees participate in all legally mandated benefit programs, they are ineligible for all of MHP's other benefit programs.

Ethical Standards

All MHP employees share responsibility in observing a code of ethics requiring truthfulness, honesty, and integrity in all activities. Each employee will be expected to adhere to any and all confidentiality policies of MHP. If you are ever in doubt whether a situation or activity meets our ethical standards or compromises MHP's reputation or if confidentiality will be breached, please don't hesitate to ask your supervisor, General Counsel & Deputy Director, the Chief Financial & Administrative Officer, or any senior manager.

Exempt or Non-Exempt Status

Each employee is designated as either Exempt or Non-Exempt from federal and state wage and hour laws. Non-exempt employees are entitled to overtime pay under specific provisions of the Fair Labor Standards Act (FLSA), while exempt employees are excluded from specific provisions of federal and state wage and hour laws.

Exempt employees hold executive, administrative, professional, and sales positions as defined by the FLSA, and are not eligible for overtime pay.

Non-exempt employees are eligible for overtime pay when you work more than 40 hours whether paid on a salary or an hourly basis, and are required by law to maintain time records of all work performed.

General Rules of Conduct

MHP expects our employees to use common sense. While we cannot anticipate every situation, we expect that our employees will maintain behavior that is both honest and straightforward and deal with issues fairly and timely. If you are not sure what to do in a given situation, it is your responsibility to speak to your supervisor, the Chief Financial and Administrative Officer, or any senior manager.

Employees should be careful to refrain from speech, conduct or behavior, on or off the job, which could adversely affect MHP's reputation and/or mission.

Gifts and Gratuities

It is the general policy of MHP to prohibit the solicitation or receipt of anything of value in exchange for favorable treatment in connection with any transaction or business of this institution. It is not the policy of MHP to prohibit the receipt of normal amenities of nominal value (less than \$50.00) in the ordinary course of business. Personnel of MHP may not solicit, directly or indirectly, any form of gratuity or entertainment.

MHP recognizes that there are times when you may wish to accept an invitation to attend a social event from a current or potential business associate in order to further develop the business relationship. These events must not include expenses paid for any travel costs or overnight lodging. The cost associated with such an event must be reasonable and appropriate. As a general rule, this means that the cost will not exceed \$50 per person. In the event that the amount exceeds \$50, the amount requires disclosure to the Chief Financial and Administrative Officer, Deputy Director & General Counsel or Executive Director who will provide further instructions regarding attendance at the event.

Perishable or consumable gifts given to a department or group are not subject to any specific limitation. You may never accept cash or cash equivalents, such as gift certificates. Finally, under no circumstances may you solicit a gift.

Disclosure. MHP recognizes that acceptance of certain benefits by its officials does not amount to a corrupting influence on MHP's transactions. MHP may approve of other circumstances, not identified above, in which a MHP official accepts something of value in connection with MHP business provided that such approval is made in writing, disclosing all relevant facts:

1. The name of the person giving the gift;
2. The nature of the gift;
3. The value of the gift;
4. The circumstances surrounding the receipt of the gift.

Harassment Policy

MHP supports an employee's right to work in an environment free from sexual harassment. It is our policy that no employee may harass another. In addition to sexual harassment, harassment is also illegal when harassment is based on age, color, disability, gender, national origin, race, religion, ancestry, sexual orientation, veteran or marital status, physical appearance, or any other basis applicable under federal or state law.

This policy applies to all terms, conditions, and privileges of employment, including but not limited to recruitment, hiring, performance reviews, training, development, promotion, transfer, compensation, benefits, educational assistance, layoff and recall, social and recreational programs, associate facilities, termination and/or retirement.

Sexual harassment is behavior directed towards either a male or female employee(s) on the basis of gender, and can include sexual advances, requests for sexual favors, or verbal and physical conduct of a sexual nature when:

- a) submission to such conduct is made either explicitly or implicitly a term or condition of employment;
- b) submission to or rejection of such conduct is used as the basis for making employment decisions; or,
- c) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.

If you have any questions about what constitutes harassing behavior, ask your supervisor or the Chief Financial & Administrative Officer. MHP's Sexual Harassment Policy is on Page 9 of this document.

If any employee of MHP believes that he/she has been subjected to sexual harassment, the employee is strongly encouraged either to inform his/her supervisor or the following individuals: Executive Director, Deputy Director & General Counsel, Chief Financial and Administrative Officer, Chairman or Vice Chairman of the Board of Directors. The names of these individuals and their contact information can be found in the Policy posted on Page 9 of this document.

Any reported incident will be promptly and thoroughly investigated. If, as a result of the investigation, it is determined that any individual engaged in conduct that either constitutes harassment or otherwise violates MHP policies, appropriate remedial or disciplinary action will be taken.

If you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the following government agencies: U.S. Equal Employment Opportunity Commission (EEOC) or the Massachusetts Commission Against Discrimination (MCAD). Using MHP's internal reporting procedures does not prohibit you from filing a complaint with these agencies. Each of these agencies has the following time periods for filing a claim (EEOC – 300 days; MCAD – 300 days). See the policy on Page 9 for contact information..

Retaliation against an individual who has complained about harassment, and retaliation against individuals for cooperating with an investigation of harassment complaint is unlawful and will not be tolerated by this organization.

DO NOT ASSUME THAT MHP KNOWS ABOUT YOUR SITUATION. REPORT ALL INCIDENTS OF HARASSMENT TO YOUR SUPERVISOR, THE CHIEF FINANCIAL & ADMINISTRATIVE OFFICER, OR ANY OTHER MEMBER OF THE MANAGEMENT TEAM.

Information Systems Usage

MHP makes available to you some or all of the following equipment and software to help us deliver the best possible service to our customers:

- Desktop Computers

- Laptop Computers
- Electronic Mail (E-Mail)
- Internet Access
- Fax Machines
- Telephones
- Cellular Telephones
- Voice Mail
- CD ROM Players
- Modems
- Document Scanners

These “Information Systems” have been provided to assist you in carrying out MHP’s business. All MHP Information Systems are the property of MHP and are to be used for business purposes. **MHP INFORMATION SYSTEMS ARE NOT PRIVATE.** Thus, any information you input or transmit on an MHP Information System can and may be reviewed by MHP without prior notice to you, even if that information is protected by your individual password. MHP explicitly reserves the right to access, monitor, review, copy or delete any information stored or transmitted on any MHP Information System at any time as MHP deems appropriate. This may include random, unannounced audits to ensure that MHP’s Information Systems are being used in accordance with this policy.

MHP recognizes the need for occasional personal use of information systems. However, employees are expected to keep personal use to a minimum both in terms of frequency and the actual time spent.

Misuse of MHP’s Information Systems will subject an employee to disciplinary action up to and including immediate dismissal. Examples of misuse of MHP’s Information Systems are:

- Unauthorized dissemination of confidential or proprietary information;
- Dissemination of confidential or proprietary information without appropriate security measures;
- Unauthorized dissemination of MHP information to non-employees or unauthorized employees;
- Viewing or disseminating obscene, pornographic, abusive, slanderous, defamatory, harassing, vulgar, threatening, and/or offensive material;
- Copying or distributing copyrighted materials in violation of copyright laws;
- Unauthorized posting of information on the World Wide Web, such as in chat rooms, blogs or public message boards;
- Unauthorized use of MHP’s name or trademarks;
- Inappropriate personal use;
- Use that violates any other MHP policy including policies regarding confidentiality, courtesy, solicitation, and harassment;
- This list is not intended to be all inclusive.

Due to the risk of outside viruses and applications that may conflict with our computer systems, you may not change or augment your work systems or settings with any personal software or change system parameters unless you have prior approval from your supervisor or the IT Manager. Employees may not download/upload material from the Internet onto their company computer without permission. In addition, because of the necessity of protecting documents, e-mails, and other information from unauthorized access, do not give your password to any co-workers or third parties. Do not open e-mail with attachments that end in any format other than .doc, .txt, .pdf or xls. If you receive an attachment in your e-mail that is in a different format, call IT before opening it. Chat software and instant messaging software are a major security risk to MHP data and may not be used under any circumstances.

Employees may not download any computer programs for personal use onto their company computer without approval from the IT Manager.

Employees who post blogs are responsible for their content and any employee postings must be clear that their views are not necessarily those of MHP. The content of any communication (including blogs) must be consistent with all MHP workplace policies. Employees may not slander, libel, harass or be offensive in their blogs, including comments regarding superiors, colleagues, MHP or other organizations including competitors.

An employee should not have any expectation of privacy regarding any information that he or she creates, stores, accesses, sends or receives through MHP's electronic, telephonic, communication and computer systems. An employee's use of MHP's systems or equipment will be considered consent to this policy and a waiver of any expectation of privacy.

Employees are representatives of MHP and must exercise due care not to use any MHP Information System in a manner that would violate any law or reflect unfavorably on MHP. MHP Information Systems are intended to assist you in performing your job. Use them carefully, conservatively and courteously. Violation of this policy will result in disciplinary action, up to and including immediate termination.

MHP Property

Certain positions within MHP require that the employee be issued MHP equipment and/or property to be used for work purposes either on-site at MHP premises or at the employee's residence. It is expected that such issued equipment or property will be utilized and maintained in an appropriate way according to product standards, solely for work-related purposes. Although in the employee's possession, all such MHP property and equipment remains MHP property and can be inspected at any time, including locked cabinets. Should the employee leave MHP's employ for any reason, all such equipment and property issued to the employee must be returned. Employees are responsible for property that was damaged, lost or misused will be deducted from the employee's paycheck.

Non-Fraternization

MHP recognizes that involvement in a romantic relationship may compromise or create a perception that compromises a supervisor's ability to perform his/her job. Any involvement of a romantic nature between a manager or supervisor and anyone he/she supervises, either directly or indirectly, is prohibited. Violation of this policy will lead to corrective action up to, and including, termination of the management employee involved in the relationship.

Outside Employment

MHP does not limit an employee's activities during non-working hours unless those activities interfere or conflict with the employee's ability to fully and effectively perform his/her job responsibilities, whether directly or indirectly. All employees will be judged by the same performance standards and will be subject to scheduling demands, regardless of any existing outside work requirements.

Outside employment for a competitor or work that constitutes a conflict of interest is prohibited. If an employee accepts outside employment, he/she should notify his/her supervisor, General Counsel or the Chief Financial and Administrative Officer to ensure that his/her position does not pose a conflict of interest. Employees may not receive any income or material gain from individuals outside MHP for materials produced or services rendered while performing their jobs.

If it is determined that your outside work interferes with performance or the ability to meet the requirements of your position, you may be asked to terminate the outside employment if you wish to remain with MHP. The holding of a second job does not eliminate the employee's obligation to work overtime when necessary.

An employee automatically relinquishes the right for workers' compensation benefits for injuries or illness that occur as a result of outside employment.

Political Activity

MHP employees are also subject to a state law restricting outside political activity, M.G.L. Chapter 55, and to the requirements of the state Office of Campaign and Political Finance. The law restricts an employee's ability to raise funds for a political candidate or committee. For more information, visit their website by double clicking on the following link, <http://www.state.ma.us/ocpf>.

Press Contact

MHP employees shall refer all press inquires to the Director of Public Affairs and shall not speak to the press on MHP-related business without the approval of the Director of Public Affairs or Executive Director.

Public Records

Any documents or other records created by you in the performance of your job or using MHP facilities or equipment may be considered “public records” for purposes of the Massachusetts Public Records Law, M.G.L. Chapter 4, §7(26), and are potentially subject to public disclosure upon request. Such records are also subject to legal discovery and may have to be provided to third parties in civil or criminal proceedings. This includes not only printed documents but also calendars, handwritten notes and electronic records such as e-mail and voice mail messages. All Public Records Law requests shall be forwarded immediately to the Deputy Director & General Counsel.

Please note that e-mail messages may be retained electronically and are subject to the Public Records Law even after they have been deleted. Such records are not private and employees must not create any documents or use any language that might be considered offensive, defamatory or unprofessional or that would subject MHP to embarrassment or potential liability if publicly disclosed.

MHP also reserves the right to monitor or review any information stored or transmitted on its premises or equipment. All e-mail messages, internal or external, business or personal, are considered records of MHP. Employees cannot expect that messages will be private. MHP reserves the right to access any messages, existing or deleted, at any time without notice.

Smoke-free Workplace

Policy. Smoking is prohibited in all facilities and areas of the entire workplace with no exceptions. Smoking is not permitted anywhere at MHP, including all common work areas, elevators, hallways, restrooms, conference and meeting rooms, and all other enclosed areas in the workplace. The policy applies to all employees, clients, consultants, contractors, and visitors.

Solicitation and Distribution

In order to prevent disruption of our operations, and to ensure a productive and secure environment, solicitation and distribution is prohibited at the MHP premises by any person except in accordance with the rules outlined below.

Solicitation by an employee of another employee is prohibited while either person is on working time. “Working time” is all time when an employee’s duties require that he or she be engaged in work tasks, but does not include an employee’s own time, such as meal periods and scheduled breaks. In addition, solicitation is prohibited at all times in work areas.

Employees are not permitted to distribute or post advertising material, handbills, printed or written literature of any kind at any time in work areas. Materials may, however, be posted or distributed in the kitchen.

Solicitation, distribution of literature, or trespassing by non-employees is prohibited on MHP premises at all times.

Violence in the Workplace

The safety and security of our employees and visitors is of utmost importance. Threats, threatening behavior or acts of violence against employees, visitors or guests of MHP will not be tolerated. Violations of this policy will lead to disciplinary action, up to and including immediate termination. In addition, MHP is sensitive to issues of domestic violence and the potential danger it poses to our employees and our workplace. Accordingly, MHP will not hesitate to contact the appropriate law enforcement authorities in the event of any threatening behavior or act of violence against employees, visitors or guests of MHP, and to initiate criminal prosecution, if appropriate.

No employee shall be permitted to bring any guns, knives or other items, which could be used as weapons onto MHP premises. MHP reserves the right to prohibit employees from carrying any items which management, in its sole discretion, deems to be dangerous or potentially dangerous.

If you become aware, either directly or indirectly, of any violence or threats of violence, whether vague, direct or indirect, notify your supervisor, the Chief Financial & Administrative Officer, or any senior manager immediately. In addition, MHP requests that employees who currently hold or seek to obtain temporary or permanent restraining orders against others who have threatened or committed violent acts against them to so inform their supervisor and the HR Administrative Assistant in order to apprise MHP of any potential threats to your security or the security of others within our workplace. MHP management understands the sensitivity of this type of information, and will make every effort to protect the confidentiality and privacy of the person(s) involved.

Sexual harassment policy

I. Introduction

It is the goal of MHP to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. 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.

Because MHP takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

II. Definition of Sexual Harassment

In Massachusetts, the legal definition for sexual harassment is this:

“sexual harassment” means 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 by creating an intimidating, hostile, humiliating or sexually offensive work environment.

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.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute 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 which if unwelcome, may constitute sexual harassment depending on 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.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization.

III. Complaints of Sexual Harassment

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with our organization. This may be done in writing or orally.

If you would like to file a complaint, you may do so by contacting:

MHP Executive Staff:

Clark Ziegler, Executive Director
Massachusetts Housing Partnership
160 Federal Street
Boston, MA 02110
(617) 330-9955 x223

Judith S. Jacobson, Deputy Director
Massachusetts Housing Partnership
160 Federal Street
Boston, MA 02110
(617) 330-9955 x226

Charleen Tyson, Chief Financial & Administrative Officer
Massachusetts Housing Partnership
160 Federal Street
Boston, MA 02110
617-330-9955 x240