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Owner Elizabeth Kang:
Human Resources Compliance Manager
Area Human Resources
Applicability Memorial Healthcare System

E-19 Anti-Harassment

PURPOSE

Memorial Healthcare System provides a work environment free from all forms of harassment and retaliation.

SCOPE

All Memorial Healthcare System employees are covered by and expected to comply with this policy. This policy applies to the conduct of all individuals working at all levels within the Healthcare System. This includes employees, volunteers, students, vendors, and medical staff. This policy covers conduct at work, including off-site events, and, in certain circumstances, conduct off-duty, including online behavior.

Concerns related to sex discrimination in an educational program (students and residents) must be reported using the procedures described in MHS HR Policy E-32 Title IX Sex Discrimination – Complaint Procedure.

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POLICY GUIDELINES

Employees must treat each other with dignity and respect. They should always consider whether their words or behavior could be offensive. Even unintentional harassment is unacceptable.

Harassment is any unwanted comment(s) or behavior(s) that:

1. Is/are sexual in nature or based on a protected category (listed below); and
2. Create(s) an intimidating, hostile, or offensive environment.

Harassment can be a single incident or a series of incidents.

Harassment is not limited to sexual harassment. It can also be related to age, race, color, sex, national or ethnic origin, religion, pregnancy, marital or parental status, sexual orientation, disability, military service, protected veteran status, genetic information, political affiliation, or any other categories protected by applicable federal, state or local law, ordinance or rule.

Examples of comments or behavior that may be harassment include:

- **Physical:** Unwanted touching, hugging, brushing against someone, grabbing, pushing, etc.
- **Verbal:** Suggestive or derogatory comments, jokes, threats, slurs, mocking or belittling, etc.
- **Visual:** Sexual or discriminatory pictures, gestures, cartoons, calendars, objects, staring, etc.
- **Electronic:** E-mails, texts, social media posts, chats, blogs, etc.

A person may feel harassed even if they are not the intended "target." For example, jokes about a different ethnic group may be offensive to someone who is a bystander.

Harassment is prohibited no matter who the harasser is. It does not matter if that person is a manager, co-worker, volunteer, or a third party. Third parties are people who may interact with you at work but are not employees of Memorial. They may be patients, visitors, community physicians, or vendors, to name a few. Harassing behavior from these individuals is not tolerated. For example, if a vendor makes you uncomfortable by touching you or making offensive comments, you should report the conduct or comments in accordance with the reporting procedures listed below.

PROCEDURES

Reporting Harassment

Memorial is serious about its commitment to a harassment-free workplace. You have many ways to report your concerns. These reporting opportunities are referred to as "Reporting Resources":

- **Your Department Leader.**
- **Human Resources/Employee Relations** (your facility HR/Employee Relations team or any Memorial HR/Employee Relations team). If you don't know who to call in HR, the HR Service Center can help: 954-265-5903.
- **Corporate Compliance:** 954-265-1866.
- **Compliance Hotline:** 954-265-5855 (if you use the Hotline, please provide enough details so that we can investigate your concern).

If you believe someone is harassing you, you may discuss the problem with that person to explain that their comments or behavior makes you uncomfortable. You should also report the comments or behavior to any of the Reporting Resources.

Although it may feel better to tell someone else about your experience, just discussing your concerns with a co-worker or friend is not an appropriate way to report harassment. You must report harassment to any of the Reporting Resources.

If you hear comments or see behavior that you believe is harassing, even if it is directed towards someone else, you should report your concerns to any of the Reporting Resources. If you are not sure if the comments or behavior is harassment, contact Employee Relations for more information.

If you hold a supervisory position, you must report comments and behavior described in this policy immediately. Failure to do so could result in disciplinary action, up to and including termination of employment.

Memorial takes all claims of harassment very seriously, and reports of harassment will be reviewed promptly and investigated where appropriate. We will gather information and facts to determine if there was a violation. If we conclude that there was a violation, we will take appropriate action, regardless of the level of the employees involved.

Memorial's support for its employees does not end with the investigation. We understand that making a report takes a lot of courage and can be stressful. Even if the harasser is removed, sometimes you may still need support. Memorial's Employee Assistance Plan (EAP) has people trained to help you manage this difficult time. Information on how to contact the EAP can be found on Memorial's HR intranet page.

Memorial also prohibits retaliation for reporting violations of this policy, making a harassment or retaliation claim in good faith, or cooperating in any investigation concerning a possible violation of this policy. If you believe that someone has violated this no-retaliation policy, you should report your concerns to any of the Reporting Resources.

Special Reporting Procedures Relating to Sex Discrimination and Sexual Harassment of Students and Residents

All employees are expected to report any incident of sex discrimination, including sexual harassment, occurring in an education program or activity operated by Memorial of which they become aware to the Title IX Coordinator at TitleIXProgram@mhs.net. All reports of sex discrimination in an educational program are addressed pursuant to HR Policy E-32 Title IX Sex Discrimination.

Anti-Harassment Training

Anti-Harassment training is conducted during New Employee Orientation attended by all employees newly hired. After their first year of employment with Memorial, all employees and leaders are required to take Anti-Harassment training annually. Training modules are assigned in the learning management system and are required to be completed by the established deadline each year.

REFERENCES

MHS HR Policy E-27 Anti-Retaliation

MHS HR Policy E-32 Title IX Sex Discrimination

MHS HR Policy E-32 Title IX Sex Discrimination – Complaint Procedure

POLICY OWNER

Human Resources

If any of the statements contained in this policy conflict with any verbal statements or agreements made by any representatives of MHS, then the statements contained in this policy shall control the outcome of any such conflict.

Memorial reserves the right to modify this policy in whole or in part, at any time, at the discretion of Memorial or as required by applicable law, regulation, or governing/accrediting body.

Employees who have questions regarding information contained in this policy should contact the Human Resources Department.

ONLINE LOCATION

All policies are subject to amendment. The most recent version of this policy can be accessed internally online: <https://mhs-system.policystat.com/>.

This Policy / Guideline / SOP is intended to provide Memorial health care professionals with guidelines for addressing the subject matter herein. This Policy / Guideline / SOP is not meant to be a substitute for the standard of care or to restrain professional judgment or opinion.

Attachments

 [E-19 Anti-Harassment - FAQs - January 2025_1.23.2025.docx](#)

Approval Signatures

Step Description	Approver	Date
Policy Owner	Elizabeth Kang: Human Resources Compliance Manager	01/2025

Applicability

Memorial Healthcare System