



The Guild
FOR HUMAN SERVICES

Employee Handbook

Revised July 1, 2020

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Important Information about Employee Handbook

The Guild for Human Services, Inc. has developed the Employee Handbook to provide an overview of The Guild's employment philosophy, benefits programs and employee-relations policies. **The Employee Handbook is NOT an employment contract.**

Revocation of Prior Policies

- This Employee Handbook supersedes and revokes any previous Employee Handbook or written or unwritten policies or practices.

Non-Contractual

- The contents of the Employee Handbook are presented as a matter of information only.
- The Employee Handbook is not intended to create, nor is it to be construed to constitute, a contract, express or implied, between The Guild and any employee or employees.
- It does not guarantee any fixed terms and conditions of your employment.
- Any written material distributed to employees pursuant to state or federal law does not impose any contractual liability on The Guild.

Policies Subject to Change

- While The Guild believes wholeheartedly in the plans, policies and procedures described in the Employee Handbook, they are not conditions of employment, nor are they promises or guarantees of future benefits or any other terms and conditions of your employment.
- The Guild reserves the right to modify, revoke, suspend, terminate or change, at its sole discretion, without the consent of any employee, any or all such plans, policies or procedures, in whole or in part, at any time, with or without notice.

At-Will Employment

- Your employment at The Guild is at-will.
- As an employee at-will, your employment at The Guild is not guaranteed for any specific period of time.
- You may terminate your employment for any or no reason and at any time, with or without any prior notice. However, if you do not provide The Guild with reasonable notice of your departure, you may be considered to be ineligible

for rehire.

- The Guild may terminate your employment at any time, at its sole discretion, for any or no reason, with or without any prior notice, and regardless of the date of payment of wages or salary.
- Neither the Employee Handbook nor any other organizational document confers any contractual right, either express or implied, to remain in The Guild's employ.
- Your employment at-will can be changed only by a written employment agreement signed by you, the chief financial officer and the chief executive officer or, in the case of the chief executive officer, by the president of the Board of Trustees.

The Employee Handbook should not be considered to be the only or final source of information, and you should consult with your supervisor and/or the Human Resources Department with any questions that you may have about the interpretation of policies outlined in the handbook.

When changes in personnel policies occur, a reasonable effort will be made to notify employees of such changes. However, if at any time there is a conflict between this policy and the actual policy, the terms of the actual policy will govern, even if employees have not yet received notice of the actual policy.



Section I: Welcome to The Guild

Dear Guild Colleagues,

Welcome to The Guild for Human Services! We are looking forward to having your energy and expertise on our team!

There is a lot to learn as you get started in these first weeks. You may feel a bit overwhelmed with the amount of training and new processes we're throwing at you. We understand. Our best advice is to start by focusing on what is most important, our mission:

The mission of The Guild for Human Services is to educate, encourage and empower individuals with intellectual disabilities so they may achieve their full potential to lead high-quality lives and participate meaningfully in society.

Notice that The Guild's mission is about *quality of life*. That quality extends to you. The Guild's leadership is committed to your professional growth and connection to the people we serve. Your daily work experience should be filled with meaning and impact.

To that end, we encourage you to learn as much as you can while you are at The Guild, including the information outlined in the Employee Handbook. If you need help along the way, we are here to support you.

We can't wait to see all that you accomplish at The Guild!

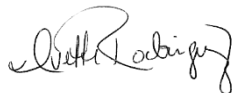
Take care,



Amy C. Sousa, PhD
Chief Executive Officer



Maureen Costello-Shea, MEd
Chief Program Officer



Ivette Rodriguez, MS
Chief Financial Officer



Michael J. Clontz, MSW, LICSW
Chief Operating Officer



Jennifer Magnuson, MA, BCBA
Chief Clinical Officer



Annie Willis, MS, BCBA
Chief Education Officer

Mission and Values

Mission

The mission of The Guild for Human Services is to educate, encourage and empower individuals with intellectual disabilities so they may achieve their full potential to lead high-quality lives and participate meaningfully in society.

The Guild's Core Values

We, The Guild Staff, believe in...

Integrity

We value an open, honest environment.

Respect

We treat everyone equally, with care and humanity.

Diversity

We welcome people's differences.

Collaboration

We listen, share and innovate together.

Excellence

We are dedicated to doing the best for the individuals we support and our extended community.

Employee Classifications

Full-time employees are those employees whose job descriptions require them to work at least 40 hours per week on a regular basis. Full-time employees are eligible for Guild benefits. For more information, refer to section on Compensation and Benefits.

Part-time employees are those employees whose job descriptions require them to work fewer than 40 hours per week on a regular basis, although such employees may regularly or from time to time work 40 hours or more per week. Part-time employees, working a minimum of 20 hours a week, are eligible for certain Guild benefits on a prorated basis after the applicable requirements for length of service have been met.

“On-call/relief/substitute” employees are those employees who have no minimum scheduled hours and no specifically assigned residence at which to work. “On-call/relief/substitute” workers are not eligible for Guild benefits.

Temporary employees are those who have been hired for a particular project or a specified period of time. Temporary employees may work a full-time or part-time schedule, depending on the circumstances and The Guild’s need, and are not eligible for Guild benefits.

Employees are occasionally referred to in the Employee Handbook as “exempt” or “non-exempt.” Exempt employees are professional, executive or administrative employees (as those terms are defined by law) and are not paid overtime compensation. Non-exempt employees are all other employees and are paid one and one-half times their regular hourly rate for hours worked in excess of 40 in a week.

I-9 Immigration Form

The Immigration Reform and Control Act of 1986 requires The Guild to obtain from every new employee proof of identity and employment eligibility. Within the first three days of employment, each employee is required to complete an I-9 Immigration Form. Any employee who fails to provide information regarding employment eligibility or who provides false information regarding employment eligibility will be subject to immediate termination.

Introductory Period

New employees are considered to be in their introductory period for 90 days and would typically have an oral or written supervisory review during that period. The introductory period gives new employees an opportunity to learn the duties of their position and to evaluate the job and The Guild. It also allows The Guild time to orient, train and assess the aptitude and performance of new employees. The introductory period may be extended at the discretion of The Guild.

While in the introductory period, new employees accrue but may not use vacation time. All full time employees will receive a prorated amount of personal hours based on their date of hire. Employees can access personal time during the introductory period with supervisor approval and medical documentation. Employees are eligible for health, life, retirement and disability insurance benefits during the introductory period.

A new employee's supervisor may discuss unsatisfactory job performance with the new employee during the introductory period and give the new employee an opportunity to improve his or her work performance. A new employee whose performance is deemed unsatisfactory by The Guild may be discharged at any time during the introductory period without resort to The Guild procedure regarding Employee Concerns.

In most cases, the introductory period ends upon completion of the oral or written introductory performance review. The new employee's supervisor will evaluate the new employee's performance and discuss that evaluation with the employee at the introductory performance review. Acceptable performance during the introductory period and continued employment after the period ends do not alter the employee's at-will employment status or guarantee employment for any period of time.

Orientation and Training

Shortly after an employee begins employment with The Guild, the Human Resources Department and/or direct supervisor will provide an orientation session that includes an overview of The Guild's goals, philosophy, organizational structure, personnel policies and procedures, and employee benefits. Eligible employees may sign up for medical, dental, disability and life insurance through the Human Resources Department.

A new employee's supervisor will arrange for any specific training that allows the employee to perform effectively. Attendance at certain required training is the employee's responsibility. An employee desiring additional training should request it from his or her supervisor.

New Hire Packet

A new employee must complete a New Hire Packet, available from the Human Resources Department. The packet contains a variety of forms, insurance information and other documentation required to place you on the payroll. These forms need to be completed within three days of employment. A copy of your valid driver's license or government-issued photo identification and work authorization are required.



Section II: Employee Role and Responsibilities

Job Descriptions

A central job description file is located in the Human Resources Department as well as on The Guild's server under "All Staff." Written job descriptions are available for all positions at The Guild. These descriptions serve to identify essential job functions and duties. A copy of your specific job description is included with your employment letter. The Guild welcomes employee input for the purpose of keeping job descriptions current. Employees should contact their immediate supervisor to discuss questions or concerns about their job descriptions.

Confidentiality

In the course of their work, employees may learn or come into contact with confidential information about The Guild or the individuals it serves; disclosure of such information would be harmful to The Guild or its clients. Employees are prohibited from disclosing such confidential information to anyone outside The Guild without the written consent of The Guild.

Client Confidentiality

The Guild strictly adheres to all state, federal and ethical guidelines pertaining to issues of confidentiality. All staff are required to respect the confidentiality of the clients, including but not limited to the identity of clients, treatment plans, diagnoses or any other protected health information as identified by Public Law 104-191 or protected educational information as identified by The Family Educational Rights and Privacy Act (FERPA), 20 U.S.C. § 1232g; 34 CFR Part 99.

Furthermore, The Guild is committed to protecting individuals' health information in compliance with the Health Insurance Portability and Accountability Act of 1996 (HIPAA). HIPAA imposes requirements relating to the privacy and security of protected health information (PHI) on covered entities. All Guild staff members and volunteers must safeguard appropriately the PHI that they access, use and/or disclose. PHI access must be limited to the amount minimally necessary to provide the services.

In addition, all professional staff are required to follow the code of ethics of their specific discipline and are subject to the legal provisions for professional licensure, including, but not limited to, confidentiality provisions.

Guild staff and volunteers are responsible for ensuring that appropriate safeguards are implemented to protect the confidentiality, integrity and availability of the confidential client information in The Guild's care. Such

safeguards shall include administrative, technical and physical safeguards pursuant to the HIPAA Security Rule. Safeguards shall apply regardless of form or format of data, device or storage (e.g., verbal, paper, electronic, server, portable device, etc.). All members of The Guild community are obligated to report immediately a known or suspected information security violation by reporting it to the privacy officer or chief executive officer.

Notification of any persons impacted by a breach of confidentiality shall be reviewed and coordinated by the privacy officer and chief executive officer and shall follow appropriate legal requirements.

Exceptions to client confidentiality include the following:

- Guild employees are mandated by law to report a reasonable suspicion of physical abuse, sexual abuse or neglect of a child (under 18 years old) to the Massachusetts Department of Children and Families.
- Guild employees are mandated by law to report a reasonable suspicion of physical abuse, sexual abuse or neglect of a vulnerable adult (18 years or older) to the Massachusetts Disabled Persons Protection Commission.
- Guild employees are required to report credible threats that an individual has an actionable plan to harm self or another.

Proprietary Confidentiality

Confidential information means any and all information, other than information that at any time becomes lawfully available to the general public. Such information includes but is not limited to program information or strategies; business information such as market strategies, employee information, contractual information, billing information and manuals; contracts; and research data. Confidential information can be in written or oral form. Communication of this type of information outside of normal work channels is expressly forbidden.

All such confidential information will, at all times, be the property of The Guild. Upon termination of employment, and at any other time upon request of The Guild, an employee shall promptly deliver to The Guild any and all physical and electronic records in the employee's possession or control that contain confidential information about The Guild, whether those records were supplied to the employee or prepared by the employee and in whatever form they take. The employee's obligation to observe confidentiality shall be applicable following the employee's separation of employment with The Guild.

Personal Appearance

This policy concerns appropriate attire during working hours and applies to all Guild staff, volunteers and interns and to all offices, facilities and residences of The

Guild.

The personal appearance of employees should be appropriate for the work environment. Employee attire should be neat, clean, well maintained and appropriate to assigned position. Employees should avoid attire that will detract from The Guild's professional image or will interfere with their ability to perform their job responsibilities safely. Employees' attire should provide an appropriate model for individuals served.

These dress code rules always apply:

- Attire should be clean, safe, in good repair and not overly revealing.
- Undergarments should not be revealed at work.
- All clothes must be work appropriate. Clothes that are typical for workouts and outdoor activities are not allowed unless the job assignment is specific to athletics or outdoor activities. Some examples of workout clothing include, but are not limited to, stretch/yoga pants, sweatpants with or without elastic at the bottom and jogging suits.
- Shorts above knee length, tank tops, mesh shirts, cutoff shirts, baseball caps and T-shirts with controversial or vulgar slogans are not appropriate. Jeans may be worn; however, they must not be faded, frayed, ripped or torn – even if by design.
- Athletic footwear may be worn by staff in client-facing positions or in the kitchen and facilities departments as long as they are in presentable condition. Staff working in administrative roles may not wear athletic footwear unless performing in an athletic job assignment, e.g. Field Day.
- For safety reasons, staff may not wear open-toe shoes at any time. Beach-style flip flops are not appropriate in any department or Guild facility.
- Employees providing direct care should not wear jewelry, scarves, strings or hoodies that dangle away from the body. An employee's attire should not interfere with safety or job performance and should not distract others.
 - Ear jewelry must be less than two inches in diameter and length. If safety is a concern, individual departments may modify this guideline to be more protective of safety.
 - Gauges must be solid and not exceed ¼ inch in diameter. Jewelry connectors are not permitted.

This policy is intended to provide guidelines on dress and appearance and is not meant to address all situations. Therefore, depending on the nature of the work environment, work performed, involvement with the public or other circumstances, there may be some variation in dress guidelines. Consistent with this policy, exceptions can be made at the department level by the department director with approval from the chief officer overseeing the division to reflect the nature of the work or special event. Employees who report to work and are not in compliance with this policy may be sent home to change and return to work,

unless some other remedy can be arranged, such as an employee putting on a jacket. Habitual non-compliance with this policy will result in disciplinary action up to and including termination. The Guild may impose whatever additional appearance and safety requirements it deems necessary at its sole discretion.

Employees should address questions regarding this policy or the appropriateness of attire to their department director, chief officer or the Human Resources Department.

Conduct

The Guild maintains certain expectations and regulations regarding employee behavior that are necessary for the efficient operation of The Guild and for the benefit and protection of the rights and safety of all. Conduct that interferes with daily operations, that is offensive or discriminatory to individuals we support or fellow employees will not be tolerated.

Workplace Expectations

All employees are expected to conduct themselves in a manner that is conducive to the efficient operation of The Guild. Examples include, but are not limited to, the following:

- Report to work punctually as scheduled or notify the supervisor when preparing to be absent from work or unable to report for work on time.
- Comply with all health and safety regulations.
- Perform assigned tasks efficiently.
- Observe confidentiality.
- Refrain from behavior deemed offensive or discriminatory toward students, individuals we support, their families or fellow employees.
- Treat parents, guardians and all other visitors with professionalism at all times.
- Maintain workplace and work area cleanliness and orderliness.
- Refrain from smoking or smoke only in designated areas at designated times.
- Dress appropriately.
- Adhere to all Guild policies and procedures.
- Report behaviors that compromise the health and safety of others.

Failure to adhere to expected work conduct, including conduct not specifically described above, will subject the individual involved to disciplinary action up to and including immediate termination. In addition, there are behaviors that are prohibited and will subject the individual involved to disciplinary action up to and including immediate termination. Examples of such behaviors include, but are not limited to, the following:

- The unauthorized use of alcoholic beverages on Guild property
- Reporting for work while under the influence of alcoholic or drugs
- The possession or use of a controlled substance other than a drug prescribed by a physician
- The sale or distribution of unauthorized drugs
- Physical or emotional assault on a fellow employee or individual we support
- Theft or intentional misuse of Guild property or the property of another employee or individuals we support
- Insubordination –the refusal of an employee to follow management's instructions concerning a job-related matter
- The use of profanity or abusive language
- Illegal or unauthorized gambling on Guild property or otherwise on duty
- The possession of firearms or other weapons on Guild property
- Falsifying any record or report such as an application for employment, a time sheet, incident report, log book entry or mileage report
- Threatening or intimidating other employees or individuals served
- Leaving assigned area during working hours without supervisor permission
- Sleeping during work hours
- Harassment of fellow employees or individuals served on the basis of race, sex, religion, color, age, national origin, disability or sexual orientation
- Leaving work without permission or before completing a scheduled shift
- Theft or abuse of Guild property
- Fraud or misrepresentation on a resume, background record check form, application or reference for employment submitted to The Guild
- Fraud or misrepresentation with respect to any financial matter, including fraudulent billing to third parties or fraudulent submission of expenses
- Acts constituting a violation of state or federal criminal law
- Failure to notify the chief executive officer or the director of human resource of arrest, criminal charge or incarceration of the employee during his or her period of employment.
- Having knowledge of any of the above behaviors by others and failing to report it to the employee's supervisor, Human Resources Department, or the chief executive officer, or covering up such behaviors.

Due Care for Individuals Served

The Guild practices positive behavioral supports for individuals in our care. All employees are expected to foster and promote environments that enhance quality of life through teaching and recognizing positive behavior, acknowledging success and supporting individuals in times of challenge. Employees are expected to treat individuals served and fellow staff in a courteous, respectful manner at all times.

Staff are required to support individuals' needs by doing the following:

- Supervise individuals served by The Guild always and everywhere, unless otherwise specified in the student's Individual Education Plan (IEP) or the adult's Individual Support Plan (ISP).
- Follow all safety rules and regulations at all times and everywhere, including on or off Guild grounds, indoors or outdoors. The physical safety of individuals served is staff's responsibility.
- Handle emergency situations in staff teams, never alone.
- Safeguard medicines, tools and any implements dangerous to individuals served.
- Protect individuals' confidentiality and personal dignity. Do not reveal or allow to be released any information, verbally or in writing, about individuals served to any unauthorized person or agency. This includes conversations in the presence of individuals served or parents and family members.
- Follow behavior management plans and other policies, regulations, rules and procedures to ensure individuals' safety.
- Avoid any action or statements that could initiate, encourage or condone any disruptive or inappropriate behavior by the individuals we support.

Under no circumstances will individuals served be subjected to the following:

- Cruel, hazardous or abusive treatment
- Corporal punishment
- Verbal abuse
- Sexual contact by staff
- Deprivation of food, sleep, shelter or bathroom facilities
- Physical restraint as a form of punishment
- Violation of individual rights
- Unauthorized disciplinary measures

These examples are illustrative of the type of behavior expected of staff and activity that is not permitted. Knowledge of any violation must be reported immediately through the prescribed abuse and neglect reporting procedure. This process is described in the abuse and neglect reporting policy contained in the program policies of The Guild. All Guild employees are mandated reporters; the failure to report abuse or neglect is a crime under Massachusetts law.

In addition, any employee having knowledge of such behavior by other employees and not reporting it to the chief officer of your division, the chief executive officer or the Human Resources Department will be subject to investigation and disciplinary action up to and including termination.

Any questions in connection with this policy should be directed to the chief executive officer, human rights officer or the Human Resources Department.

Human Subject Research

It is the policy of The Guild that all research involving human participants must be conducted in accordance with accepted ethical, federal and professional standards and that all such research must be approved by The Guild's chief executive officer. In the review and conduct of research, The Guild is guided by the ethical principles set forth in the Belmont Report. In addition, all human subject research conducted by or under the auspices of The Guild will be performed in accordance with the U.S. Code of Federal Regulations, DHHS (CFR), Title 45 Part 46 (45 CFR 46), entitled Protection of Human Research Subjects, and Parts 160 and 164, entitled Standards for Privacy of Individually Identifiable Health Information.

In addition, research conducted with human subjects must be performed in accordance with the accepted ethical principles established by professional organizations or societies that are applicable to the area of investigation. The actions of The Guild will also conform to all other applicable federal, state and local laws and regulations.

The Guild does not permit or conduct pharmaceutical or medical research.

Nepotism

Relatives

The Guild encourages employees to refer qualified individuals to The Guild for employment. Because simultaneous employment of relatives may pose problems for The Guild, special rules may be enforced in each particular situation. No employee shall directly supervise a relative, approve budgetary or expense requests of a relative or have any responsibility to evaluate the performance of a relative. Any employees who assume a position within The Guild in which they are required to perform any of these tasks with respect to a relative should notify their supervisor immediately. Relatives of the individuals served by The Guild cannot work in the same program as the individual.

Personal Relationships

Employees should be aware that romantic relationships between Guild employees may pose problems both for those individuals and for The Guild. The Guild expects the employees involved to exercise discretion and maturity in the manner in which they relate to each other at work.

Romantic relationships between employees of different levels of authority within

The Guild may create actual or perceived favoritism. For this reason, neither party to a romantic relationship should participate in formal or informal supervision, review or evaluation of the other. The Guild may alter the work responsibilities of parties engaged in a romantic relationship in order to limit their professional contact with one another.

Under no circumstances shall a Guild employee be involved in a romantic relationship with an individual served by The Guild.



Section III: Employee Documentation

Personnel Files

The Human Resources Department maintains a personnel file for each employee. An employee's personnel file includes a job description, job title, rate of pay and other compensation, job application, resume, performance evaluation(s), waivers, disciplinary action(s), required training records and termination notice (if applicable). Personnel records shall not include any information about a person other than the employee if the disclosure of such information would subject the employee to a clearly unwarranted invasion of his/her privacy.

Employees may review or obtain a copy of their personnel file by submitting a written request to the Human Resources Department, providing five business days' notice. An employee may review his or her original personnel file only in the presence of the chief operating officer or the Human Resources Department. Any employee who believes that information in his or her personnel file is incorrect may request a correction. If The Guild does not agree with an employee's requested correction, the employee may submit a written statement explaining his or her position on the matter. This statement will become part of the employee's personnel file. All personnel files are the property of The Guild and no part of them may be removed from The Guild without authorization.

Employees are responsible for promptly notifying the Human Resources Department of any change of name, address, telephone number or emergency contact information by completing the appropriate form.

The Human Resources Department will not release information other than job title, dates of employment, and confirmation of salary about an employee to persons not employed by The Guild unless the employee has given prior written authorization. To authorize the release of any additional information to prospective employers, employment agencies and search firms, an employee must sign a Release for Employment Information as part of the termination checklist or request one after leaving The Guild.

Former employees may request access and/or copies of their personnel record. The Guild shall be given five business days to produce such records. The Guild shall maintain all personnel records for seven years.

Promotions and Transfers

As part of The Guild's commitment to its employees' professional growth, The Guild will announce some job openings through an internal posting process. The Guild encourages employees to apply for any position within The Guild for which they are qualified. As a courtesy, employees should notify their supervisor if they

intend to transfer within The Guild, prior to applying to a new position. Employees who are interested in being considered for a posted position should contact the hiring supervisor. Restrictions on transfers may apply to certain positions and/or programs. All employees are eligible to apply for transfer or promotion positions after six months of employment at The Guild. The Guild retains sole discretion to decide whether to fill a position by a transfer, a promotion or a new hire.

Compensation for any employee's new position will be governed by that position's salary range. When an employee accepts a lateral transfer, s/he ordinarily receives no increase in pay. If The Guild chooses to transfer an employee to a lower position, the employee's pay ordinarily will be decreased.

A transfer or promotion is not a guarantee of continued employment. All employees remain employees at will regardless of transfers or promotions.

Performance Evaluations

New employees will receive a performance review after the first 90 days of employment. Thereafter, performance evaluations will take place on a review schedule determined by The Guild, at a minimum of annually.

The performance evaluation provides an opportunity for the employee and supervisor to review the employee's performance and establish performance goals for the next year. The supervisor will complete a written performance evaluation form, which the employee is expected to sign, acknowledging that s/he has reviewed the evaluation and been afforded an opportunity to provide feedback. All written evaluations are kept in the employee's personnel file. Employees may request a copy of the evaluation. A performance evaluation does not necessarily result in a salary increase. All salary increases must be approved in writing by the chief executive officer and are at the discretion of The Guild.

Background Records Check

General Information

- A Background Records Check (BRC) that includes a Criminal Offender Record Information (CORI) check and a Department of Children & Families (DCF) check is required for all full- and part-time employees and volunteers. In addition, the Massachusetts General Court requires all full- and part-time employees and volunteers to undergo a Sex Offender Registry Information (SORI) check and fingerprint-based checks of state and national criminal history databases.

Finally, any Guild employee who is required to drive as part of his or her job responsibilities is required to undergo a driving record check. The Guild will reimburse the cost related to the fingerprint check if the receipt is submitted to the Human Resources Department within 30 calendar days of completion.

- A Background Records Check will be completed for all applicants being considered for employment. Every three years, each employee and volunteer will also have a BRC.
- Authorized personnel who conduct BRC for employees include the chief executive officer (licensee) and the person who oversees the hiring process (reviewer). These individuals are required to submit a reviewer request to the Department of Early Education and Care (EEC) every three years to maintain their status as licensee and reviewer.
- A BRC, which includes CORI, DCF, SORI and fingerprint checks, will only be conducted at The Guild by authorized personnel and as authorized by EEC. These individuals must submit an EEC Background Record Check: Applicant/Licensee or a Back Record Check: Reviewer Request to gain authorization to process BRC checks for employees<?>.
- All applicants will be notified that a BRC check is going to be conducted and s/he will be required to complete and sign a consent for Background Record Check (BRC) form. Once that is completed, a SORI check will be completed, then employees and volunteers will receive notification to undergo a fingerprint-based check of the national and state criminal history databases. If requested, the applicant will be provided with a copy of the BRC policy.
- All personnel authorized to perform BRC checks at The Guild will be thoroughly familiar with and trained on the educational materials made available by the Department of Criminal Justice Information Services (DCJIS).

CORI Check Generated no Criminal Record, DCF Finding, SORI or National Fingerprint Record

In those instances when the CORI and DCF results are processed and there is no indication of a criminal record or DCF finding, a SORI check will be completed. Once that is completed, the next step is a fingerprint-based check of state and national criminal history databases. The Guild will confirm full employment with the applicant and move employee from conditional status to full status.

CORI Check Generated Criminal Record, DCF Finding, SORI Record or National Fingerprint Record

- Unless otherwise provided by law, a criminal record will not automatically disqualify an applicant. Rather, determinations of suitability based on CORI checks will be made consistent with this policy and any applicable law or regulations. The process related to such a determination is known as a "discretionary review."
- If a CORI or DCF check of an applicant results in the receipt of a criminal record

from EEC/DCJIS or a DCF finding, the authorized individual will closely compare the record provided by EEC/ DCJIS with the information on the CORI request form and any other identifying information provided by the applicant to ensure the record relates to the applicant.

- If a determination is made, as a result of the CORI check or the DCF check, that the applicant will no longer be considered for the position, s/he will be notified immediately. The applicant shall be provided with a copy of the criminal record as provided by EEC/DCJIS and the CORI policy; advised of the part(s) of the record that make(s) the individual unsuitable for the position for which he/she applied; and given the opportunity to dispute the accuracy and relevance of the CORI record and DCF record.
- Applicants challenging the accuracy of the policy shall be provided a copy of DCJIS's document titled Information Concerning the Process in Correcting a Criminal Record. If the CORI or DCF record provided does not exactly match the identification information provided by the applicant, a determination will be made, based on a comparison of the CORI or DCF record and documents provided by the applicant, as to which documents are accurate with respect to the applicant. Authorized personnel may contact DCJIS/EEC and request a detailed search consistent with DCJIS/EEC policy if necessary to help make such a determination.
- If a determination is made that the criminal record or DCF findings received from EEC/DCJIS pertain to the applicant and are accurate based on the information as provided in section IV of this policy, then the determination of suitability for the position will be made. Unless otherwise provided by law, factors considered in determining suitability may include, but not be limited to the following:
 - Relevance of the crime to the position sought
 - The nature of the work to be performed
 - Time since the conviction
 - Age of the candidate at the time of the offense
 - Seriousness and specific circumstances of the offense
 - The number of offenses
 - Whether the applicant has pending charges
 - Any relevant evidence of rehabilitation or lack thereof
 - Any other relevant information, including information submitted by the candidate or requested by the hiring authority
- If the SORI check is returned to EEC without a finding, EEC shall notify the hiring authority to direct the candidate to submit to a fingerprint scan. The hiring authority shall maintain EEC's approval of the SORI check in a locked secure file separate from the candidate's personnel file. If the candidate is hired, the hiring authority must document in the candidate's personnel file the date on which EEC approval was received.
- If the SORI check reveals that a candidate has been classified as a Level 2 and/or Level 3 sex offender, the finding will be treated as a "presumptive

disqualification.”.

- The candidate shall be informed by EEC:
 - That s/he is ineligible for employment or a volunteer position where there is potential for unsupervised contact with children in an EEC licensed and/or funded program unless the candidate has been granted discretionary approval pursuant to 606 CMR 14.12
 - Of the findings of the SORI check
 - Of his or her right to dispute the accuracy or relevancy of the SORI findings
 - Of the process to dispute the accuracy or relevancy of the SORI findings
 - Of the information required to obtain a discretionary review
- Should the candidate who has been classified as a Level 2 or Level 3 sex offender submit the documentation as set forth in 606 CMR 14.12(1) (a) and it is acceptable to EEC, EEC would then perform a discretionary review.
 - No candidate may be hired conditionally in any capacity, nor may he/she begin work until the hiring authority receives EEC approval of the SORI check.
 - Should EEC determine, through an address match, that an individual who is a Level 2 or Level 3 sex offender resides in a family child home, EEC will immediately refer this information to its licensing staff for appropriate action against the family childcare license or application.

Findings from Fingerprint-Based Checks

- If the fingerprint-based check reveals a “presumptive disqualification” on the candidate’s record, the candidate shall be informed by EEC:
 - That s/he is ineligible for employment or a volunteer position where there is potential for unsupervised contact with children in an EEC licensed, approved and/or funded program unless the candidate has been granted discretionary approval pursuant to 606 CMR 14.12
 - Of the findings of the fingerprint-based check
 - Of his or her right to dispute the accuracy or relevancy of the fingerprint-based check findings
 - Of the process to dispute the accuracy or relevancy of the fingerprint-based check findings
 - Of the information required to obtain a discretionary review.
- If the fingerprint-based check reveals a “discretionary disqualification” on the candidate’s record, the candidate shall be informed by EEC:
 - That s/he is ineligible for employment or a volunteer position where there is potential for unsupervised contact with children in an EEC licensed and/or funded program unless the candidate has been granted discretionary hiring approval
 - Of the findings of the fingerprint-based check
 - Of his or her right to dispute the accuracy or relevancy of the fingerprint-

- based check finding;
 - Of the process to dispute the accuracy or relevancy of the fingerprint-based check findings
 - Of the opportunity to submit additional information relevant to a discretionary review
- The hiring authority may allow a candidate to begin conditional employment and have unsupervised contact with children if the candidate's SORI check has been approved by EEC and the candidate's CORI and DCF Background Record Checks have been approved by the hiring authority. Conditional employment of a candidate may occur if the fingerprint-based check of the state and national criminal databases is pending.
- If EEC disapproves a candidate or a current employee, intern or volunteer based upon the findings of the fingerprint-based check of the state and national criminal history databases, the hiring authority shall terminate the employment of the candidate or employee, intern or volunteer within 14 days of such notice, unless informed by EEC to terminate sooner.
- The Guild will notify the applicant of the decision and the basis of the decision in a timely manner.

Documentation

- In those situations where an applicant is hired, the personnel file will contain a copy of the signed consent for Background Record Check form, documentation that the BRC was conducted and a current photo identification. The results of the BRC are maintained in a separate locked BRC file. If the applicant was hired with a discretionary review, the discretionary review questions (and all paperwork involved) and rationale for hiring are maintained with the BRC results in the separate locked BRC file.
- In those situations where an applicant with a criminal record is not hired, the CORI form is signed and returned to the Department of EEC, Background Record Check Unit, 51 Sleeper St., 4th Floor, Boston, MA 02210.

Use of Images

The Guild for Human Services may at times use photographs, audio and/or video recordings of employees for purposes of publicity, marketing and recruitment. The images will be distributed via the internet, print publications and other media.

Opt-Out Option

Employees who chose to opt out of having their images used in the manner described in the paragraph above will share with The Guild responsibility for preventing their images from being used. An employee opting out should contact the Human Resources Department for the required forms.



Section IV: Equal Employment and Safety Policies

Equal Opportunity Employment

The Guild is committed to providing equal opportunity in employment to all employees and applicants for employment who are able to perform all essential job functions as described in job descriptions, with or without a reasonable accommodation. No employee or applicant shall be discriminated against on the basis of race, religion, color, sex, age, national origin, veteran status, disability or sexual orientation. Any employee who believes s/he has been the victim of employment discrimination based on any of these factors should report the matter immediately to his or her supervisor or the affirmative action officer.

Consistent with its obligations as a state and federal contractor, The Guild has established written non-discrimination, equal-employment opportunity and drug-free workplace policies. Copies of these policies are posted at all Guild work sites.

Harassment Based on Race, Color, Religion, Sex, Sexual Orientation, National Origin, Age or Disability

It is The Guild's policy to maintain a working environment where no employee is harassed based on the race, color, religion, sex, sexual orientation, national origin, age or disability of the employee or his or her relatives, friends or associates.

Harassment is a verbal or physical conduct that demeans or shows hostility or aversion toward an individual because of his or her race, color, religion, sex, sexual orientation, national origin, age or disability and that may be offensive to others; create an offensive, intimidating or hostile working environment; or interfere with another employee's work performance. Examples of such behavior include, but are not limited to, the following:

- Epithets, slurs, insults or negative stereotyping
- Acts or jokes that are hostile or demeaning with regard to race, color, religion, sex, sexual orientation, national origin, age or disability
- Threatening, intimidating or hostile acts that relate to race, color, religion, sex, sexual orientation, national origin, age or disability
- Written or graphic material that demeans ridicules or shows hostility toward an individual or group because of race, color, religion, sex, sexual orientation, national origin, age or disability

The Guild will not tolerate any form of harassment of employees on the job by supervisors, other employees or by non-employees such as individuals served, vendors or contractors. An employee who believes that s/he has been the object of harassment based on race, color, religion, sex, sexual orientation, national

origin, age or disability, or who observes an incident of such harassment, should report the matter immediately to his or her immediate supervisor or the Human Resources Department. A supervisor who observes an incident that may constitute harassment or who otherwise becomes aware of such an incident should immediately notify the Human Resources Department, which will arrange for an appropriate investigation. All internal investigations of harassment complaints will be conducted confidentially to the fullest extent possible. Upon completion of the investigation, the employees directly involved will be advised of the results.

Any supervisor or other employee who is found to have engaged in harassment of another employee based on his or her race, color, religion, sex, sexual orientation, national origin, age or disability will be disciplined in accordance with The Guild discipline policy.

All questions regarding this policy should be directed to the Human Resources Department.

Sexual Harassment

Introduction

In addition to our general prohibition on harassment of others, it is the goal of The Guild 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 The Guild 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.

Definition of Sexual Harassment

Under Massachusetts law, sexual harassment means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or a basis for employment decisions; or 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 circumstances that constitute sexual harassment, the following are some examples of conduct, which, if unwelcome, may constitute sexual harassment, depending upon 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, 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 or cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences;
- Discussion of one's sexual activities;
- Making direct or implied requests for sexual favors in exchange for actual or promised job benefits, as further described above.

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 are unlawful and will not be tolerated by The Guild.

Complaints of Sexual Harassment

If any Guild employee believes that s/he has been subjected to sexual harassment, the employee has the right to file a complaint with The Guild. This

may be done in writing or verbally. If you would like to file a complaint, you may do so by contacting your supervisor or the Human Resources Department. These persons are available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

Sexual Harassment Investigation

When The Guild receives a complaint, we will investigate promptly the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed sexual harassment. All persons interviewed will be given the name of the accuser and will be informed that they must keep the subject of the interview, including all names, confidential and that if they fail to do so, they will be subject to discipline under Guild policies. When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action.

Disciplinary Action

If it is determined that inappropriate conduct has been committed by one of our employees, The Guild will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such forms of disciplinary action as we deem appropriate under the circumstances.

State and Federal Remedies

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below.

The United States Equal Employment Opportunity Commission (EEOC)
One Congress Street
10th Floor
Boston, MA 02114
(617) 565-3200

The Massachusetts Commission Against Discrimination (MCAD)

Boston Office: One Ashburton Place, Room 601, Boston, MA 02108, 617-727-3990

Worcester Office: 424 Dwight Street, Worcester, MA 01608, 508-799-8010

Springfield Office: 455 Main Street, Springfield, MA 01103, 413-739-2145

Workplace Safety and Nonviolence Policy

The Guild seeks to provide a culture of nonviolence, minimizing risks to safety and security. The Guild strives to provide students, individuals and employees with the safest possible environment and the knowledge necessary to carry out their job duties safely. The Guild's safety efforts shall be ongoing and focus on continuous improvement. Working safely is a responsibility shared by all employees. Employees are encouraged to participate actively in The Guild's safety efforts, including engagement with and participation in the Safety Committee.

General Security

- All Guild employees are subject to regular background record checks in accordance with the Background Record Check policy herein.
- Firearms, knives and explosives are not permitted on any Guild premise.
- The Guild provides numerous resources to ensure safety and security of The Guild's community, including but not limited to electronic locks and alarms, badging system, external cameras for some locations, and GPS tracking for vehicles.
- Emergency evacuation plans have been developed to meet the needs of each building where employees are located. Evacuations are practiced regularly with staff and individuals served.

Student/Individual Aggression

Many individuals served by The Guild can demonstrate disruptive and aggressive behaviors. Aggressive behavior among individuals with intellectual disabilities and autism does not necessarily reflect willful violence; often individuals lack the requisite social skills, which The Guild can help them learn. As a result, The Guild provides staff members with aggression prevention tools, such as instruction in the social, emotional and cognitive domains in which the individuals exhibit difficulties as well as de-escalation tools, such as verbal and physical intervention training and protective resources. Incidents of aggression at The Guild are met with immediate, nonaggressive consequences. Under no circumstances shall a Guild employee assault or abuse an individual served. The Guild takes measures to prevent aggression, including the following:

- Establishing reasonable norms and expectations;
- Avoiding confrontation;
- Minimizing competition;

- Using both verbal and nonverbal prompts and reminders;
- Providing desirable reinforcers for positive behavior;
- Intervening early (before the onset of aggressive behavior) whenever possible;
- Supervising carefully individuals' served;
- Providing student/individual-specific interventions for challenging behaviors, including functional behavior assessments and behavior support plans.
- The Guild analyzes data to learn from and prevent future aggressive behavior, including multiple layers of review of student/individual aggression, contributing factors to such aggression and opportunities for improved intervention.
- The Guild provides staff members with knowledge of aggressive behavior and instruction in the social, emotional and cognitive domains in which the individuals exhibit difficulties. In addition, The Guild trains all client-facing staff members in verbal de-escalation, self-defense and physical intervention to emergency situations using the Nonviolent Crisis Intervention training program as developed by the Crisis Prevention Institute.
- The Guild provides technical supports for preventing, responding to and analyzing aggressive behaviors, including cameras in the main building and youth residences; protective equipment, such as pads and arm guards; phones and paging systems; and on-call staff supports.
- The Guild works to provide appropriate follow-up and support to witnesses and others affected by students' /individuals' aggression through individual and group debriefings using the Crisis Prevention Institute's COPING (Control-Orient-Patterns-Investigate-Negotiate-Give) Model.
- The Guild reports incidents of individual aggression and/or injury to appropriate authorities, including, but not limited to, the Department of Elementary and Secondary Education, Department of Early Education and Care, Department of Developmental Services and the Occupational Safety and Health Administration.
- The Guild shall not retaliate against any employee for making a report to a lawful authority, including local police.

Domestic, Interpersonal and Community Violence

Violence is a public concern that affects employees in the community and the workplace. It is the policy of The Guild to promote safety in the workplace, respond effectively to the needs of victims of violence and hold perpetrators of violence accountable, thus helping to secure the fundamental human right to be free from violence.

- Offenders: The Guild will hold accountable employees who engage or assist in acts of violence. In cases in which The Guild finds that an employee has threatened, harassed or abused any employee or individual by using job-related authority or resources such as work time, workplace telephones, fax

machines, mail, email or other means, the employee shall be subject to corrective or disciplinary action up to and including termination of employment. In the event in which an employee uses job-related authority or resources to assist a perpetrator to locate a victim, assist a perpetrator to perpetrate acts of violence or protect a perpetrator from appropriate consequences for abusive behavior, that employee shall be subject to corrective or disciplinary action up to and including termination of employment.

- Victims: The Guild's Human Resources Department and Employee Assistance Plan are available to support those in need of assistance around issues of violence and to make reasonable accommodations to support a workplace safety plan for employees. The Guild will make every effort to comply and assist with enforcement of all known orders of protection, particularly orders in which perpetrators have been ordered to stay away from work sites.

Employees who are victims, or whose immediate family members are victims, of domestic violence, sexual assault, stalking or kidnapping have the right to 15 days of leave for related needs, such as health care, counseling and victims services; safe housing; care and custody of their children; and legal help, protective orders and going to court. The Guild will make every effort to allow employees to use accrued paid leave before accessing unpaid leave for these purposes.

Reporting

If you are aware of unsafe acts, have an idea for performing tasks safer or want to report a safety hazard, please take action. Talk with your supervisor or report it through the Safety Committee, Human Resources Department, chief operating officer or chief executive officer.



Section V: Compensation and Benefits

Payroll Procedures

Employees will be paid every other Friday, one week in arrears.

The Guild recommends that every employee initiates and maintains an account capable of direct deposit of pay. An employee may elect to have payments split and sent to up to two active accounts. Employees must complete the appropriate Guild direct-deposit forms and provide legal documentation of an open and valid bank account (voided printed check or bank originated letter).

It is the employee's responsibility to notify the Payroll Office when there is any change to their bank and/or bank account(s) that affects their direct deposit by completing a new Direct Deposit Authorization form. Should an employee fail to notify the Payroll Office that the bank account was closed, The Guild will not issue a paper check until the funds are received back from the banking institution.

Documenting Hours Worked

Employees who do not receive a salary (non-exempt Employees) from logging their time and location worked (punching) must access the PayCom system to punch in and out. Punching is required for each day, each shift and/or each location in which an employee works. It is not acceptable to change locations or shifts without punching out and re-punching in. All shifts must be recorded accurately by the employee.

In order for pay to be disbursed to non-exempt employees, all approvals must be obtained before 9 a.m. on Tuesday of the payroll week. Non-exempt employees must approve their own time card in order for it to be passed to the supervisor for subsequent approval. Employee approval of their own time cards is understood by all parties to be an accurate representation of the employee's time worked. Guild management and individuals within the employee's reporting structure reserve the right to discipline employees knowingly approving erroneous time cards. Corrections of errors are to be directed to your immediate supervisor. The supervisor will notify the payroll coordinator. Errors will be corrected in the next payroll period only.

After employee approval, the time card is approvable by the supervisor and any changes or edits must be routed back to the employee for change and re-approval by the employee. It is the responsibility of the supervisors and required approvers to obtain all approvals and submit time cards by the deadline. The Guild is under no obligation to disburse non-routine payroll payments as a result of late approved time card submission. The choice to disburse non-routine payroll payments and the form of such payments are at the sole discretion of the chief financial officer or the chief executive officer.

Overtime

The Guild may require employees to work overtime to meet operational requirements. All employees must obtain the approval of his or her immediate supervisor before working overtime. All overtime hours worked must be recorded on the employee's time sheet and be subsequently approved by the employee and the supervisor. No employee may be scheduled to work more than 18 hours without a break. No employee is guaranteed overtime hours.

Employees who are exempt under federal or state wage-and-hour laws (professional, executive or administrative employees as those terms are defined by federal law) are expected to spend whatever time is required of them to meet their commitments to The Guild, without additional compensation or overtime pay.

Employees who are not exempt (including those whose regular work week consists of fewer than 40 hours of work) will be paid at their regular hourly rate for all hours of work up to 40 hours within a single work week and at one and one-half times their regular hourly rate for hours worked in excess of 40 hours within a single work week. An employee assigned to two or more different jobs will be paid for all hours at the specified rate assigned to that particular job and circumstance. The maximum overtime rate The Guild will pay is one and one-half times the regular hourly rate.

No overtime will be paid until the employee logs 40 hours of regular hours worked within the work week. Paid holidays, personal days and vacation time do not count as regular hours for the purpose of computing eligibility for overtime pay. Excused or unexcused absence hours are also not considered regular hours in computing overtime.

Amended by the Board of Trustees on March 26, 2020: In the event that a Guild residence is ordered to isolate due to a presumptive or confirmed case of COVID-19, qualified Guild staff may be asked to work extended hours to support the individuals served and limit the spread of COVID-19 infection. Therefore, employees who accept such an assignment will be isolated in the residence 24/7 for one week at a time with one week renewals offered as needed by The Guild and as accepted by employees.

Hourly employees providing COVID-19 isolation services will be paid at \$2 more than their regular hourly wage for the first forty (40) hours worked; all additional hours worked, including sleeping hours, will be paid at 1.5 times the increased wage to be paid through normal payroll processes, i.e. every second week.

Salaried employees who accept such an assignment providing COVID-19 isolation services will be isolated in the residence 24/7 for one week at a time. They will be compensated with their regular salary as well as a \$3,000 weekly bonus to be paid through normal payroll processes, i.e. every second week.

Vacation

The Guild provides paid vacation time to all full-time employees. Employees earn vacation time at different rates, based on their employment classification and length of service. Vacation time begins to accrue upon the commencement of employment, but paid vacation may not be taken until employees have completed three months of service. This three months of service can be as a part-time or full-time employee. Part-time employees do not accrue vacation.

Vacation Accrual Rates

Each employee's vacation accrual rate is determined by his/her anniversary date, based on the number of complete years of active service that the employee has rendered. Based on completed months, accrual rates are governed by the following schedules:

Length of Service as of Anniversary Date	Accrual Rate *Based on 40 hours worked	Annualized Accrual Rate
Up to two years	.385 hours	10 days
Two or more years	.577 hours	15 days
Five or more years	.769 hours	20 days
Chief officers (upon hire)	.769 hours	20 days

If an employee's employment status changes (for example, if the employee goes from part time to full time) the employee's vacation accrual rate will be adjusted accordingly.

Scheduling

To help The Guild ensure adequate staffing, employees must request vacation time, in writing as far in advance as possible. The employee's immediate supervisor must approve all requests for vacation time. The Guild will attempt to accommodate each request, but it reserves the right to deny requested vacation time to meet the needs of The Guild.

Cap on Accrual

Employees are encouraged to take vacation in the fiscal year in which it is accrued. Unused vacation days may be carried over from one fiscal year to the next. Employees may not, however, carry over more than 240 vacation hours. Once employees have accumulated 240 vacation hours, their accrual of vacation will stop and will not resume until they have taken vacation and dropped below the 240 vacation hours.

Leaving The Guild

Employees who leave The Guild will be paid for any accrued and unused vacation time earned through the last completed month prior to the date of termination at the rate of pay in effect for their position as of the date of departure. All returning employees or employees switching back to full-time status can maintain their former vacation accrual rate if the rehire/switch occurs within two years of their last shift.

Holidays

The Guild issues an annual holiday schedule before the start of each fiscal year. This schedule designates those holidays observed by The Guild and how holidays falling on weekends will be treated. This Guild Holiday Calendar will be the calendar that informs employees about holidays and scheduled intersession breaks.

The Guild School will operate based on the Guild School Calendar. The Guild school calendar provides for 234 days of in session school, professional days, school closures and snow make up days.

The Guild operates residential programs that are open 365 days per year. There are times when the day program at the school will not be in session, but the residences are always open. When the residences are open, staff must be available to work.

Holiday sign-up sheets will be posted to allow employees to request their preferred schedule. The Guild will try its best to accommodate such requests. However, it will not always be possible to grant each employee's request. On those occasions, employees will be scheduled and required to work.

- Holidays falling on the weekend:
 - At The Guild School and administrative offices, all holidays will be celebrated on the dates observed by the Commonwealth of Massachusetts. As a general rule,

holidays falling on Saturday will be observed the preceding Friday and holidays falling on Sunday will be observed the following Monday.

- At Guild residences, holidays falling on Saturday and Sunday will be observed on the actual holiday (Saturday and Sunday).
- For employees eligible for holiday leave, holiday leave will be granted only when the holiday falls on their regularly scheduled workday.
- Hourly employees who are entitled to holiday leave who must work will be receive double time for all hours worked during the holiday.
- Exempt employees who are entitled to holiday leave who must work will be entitled to one compensatory day off. Time must be taken within 30 days of the holiday.
- If a holiday falls during an employee's vacation, that day will be charged as a holiday, not as a vacation day.

Religious Holiday Observance

Employees will be granted time off to observe religious holidays that they sincerely believe are required to be observed by their religion. However, employees must give their supervisor at least 10 days' advance notice of the leave. Such time shall be without pay unless the employee elects to use a personal day or a vacation day.

Intercession Holidays

Intercession Holidays for The Guild School's Educators

Intercession holidays are the periods between Christmas Day and New Year's Day and between Patriots' Day and the following Friday. During these weeks, The Guild School's educational program is closed and, under most circumstances, employees whose primary work site is The Guild School's educational program will not be required to work.

In the event that non-exempt employees educational staff are required to work on an Intercession closing day will be paid double time for each non-overtime hour worked during the closing hours, e.g. 8 a.m. to 4 p.m. Intercession days not worked are not counted as hours worked for the purpose of computing overtime.

Exempt employees who are required to work on an Intercession closing day will be eligible for a floating holiday day. Accrued Intercession floating holidays must be used by the end of the fiscal year and will not be carried over. In addition,

Intercession floating holidays accrued and not used will not be paid out upon termination of employment.

Floating Holidays for Non-Educational Staff

During The Guild School's Intercession holidays, residential programming and other essential functions will remain open or on call. "Other essential functions" include but may not be limited to nursing, school reception, admissions, facilities, payroll and human resources. Department supervisors should ensure appropriate staffing of these functions during the Intercession break.

In lieu of intercession holidays, regular, full time residential staff and other essential functions will receive up to 64 hours of Floating Holiday time annually. Any unused PTO time will be forfeited on June 30 of each fiscal year. Full-time employees hired after July 1 receive prorated benefits.

Floating Holiday banks will accrue quarterly based on the following schedule:

- July 1: 16 hours
- October 1: 16 hours
- January 1: 16 hours
- April 1: 16 hours

Employees hired after the quarterly accrual date will receive a prorated amount of hours for that quarter.

Termination of Employment

Unused Floating Holiday time will not be paid out upon termination of employment.

Notice and Scheduling

You are required to provide your supervisor with reasonable advance notice and obtain approval prior to using Floating Holidays. This allows for you and your supervisor to prepare for your time off and assure that all staffing needs are met.

Minimum Increments of Floating Holidays

Floating Holidays may be taken in hourly increments and may be combined with other leave.

Personal Time Off

The Guild expects regular attendance by its employees but recognizes that unforeseen illness, personal emergency and non-work-related injury may occur. Accordingly, The Guild provides paid personal time off (PTO) to eligible employees. PTO provides you with the flexibility to use your time off to meet your personal needs. Personal Time should only be taken for personal reasons, which strictly excludes using them for or in conjunction with vacation time.

Eligibility

All full- and part-time employees are required to provide medical documentation if they need to utilize this time before they have completed three months of employment. Part time employees will earn paid personal time off in accordance with the Massachusetts laws on earned sick time for part time employees.

Benefit

Regular full-time employees will receive 64 hours of personal time off each fiscal year. PTO banks will be credited on July 1. Any unused PTO time will be forfeited on June 30 of each fiscal year. Full-time employees hired after July 1 receive prorated benefits.

Part-time employees will accrue one hour of personal time for every 30 hours following Massachusetts sick time earning law worked, up to a maximum accrual balance of 64 hours. Part-time employees may carry a maximum of 40 hours from the prior fiscal year into the new fiscal year but will cease accruals.

Termination of Employment

Unused PTO will not be paid out upon termination of employment.

Minimum Increments of PTO

The minimum amount of PTO you can use at one time depends on whether you are an exempt or non-exempt employee. If you are non-exempt, you may not take less than one hour off at a time. If you are an exempt status employee, you must take PTO in increments of not less than one half-day.

Notice and Scheduling

You are required to provide your supervisor with reasonable advance notice and obtain approval prior to using PTO. This allows for you and your supervisor to prepare for your time off and assure that all staffing needs are met.

To take personal time, employees must, as far in advance as is possible, notify their supervisor. An employee will not have been considered to have notified their

supervisor until the supervisor has confirmed receipt, so one-way communication modes (texting, emailing, leaving of voicemail) is insufficient until the supervisor confirms receipt. If a supervisor is unavailable to confirm receipt, the employee should notify the next person up in their reporting structure. Unless otherwise instructed by the direct supervisor, an employee should provide notification each day that s/he takes personal time off. If an employee is absent three consecutive days due to injury or illness, a physician's note is required to return to work.

There may be occasions, such as sudden illness, when you cannot notify your supervisor in advance. In those situations, you must inform your supervisor of your circumstances as soon as possible.

For unscheduled personal time off, employees should notify and receive confirmation from their immediate supervisor as much in advance as possible. If sudden need arises, then employees must notify supervisors at the beginning of the regular business day or four hours prior to the start of their scheduled shift.

When possible (for example, in the case of a scheduled surgery) employees are asked to give advance notice to allow for appropriate scheduling and coverage. Employees should review the Family and Medical Leave section of the Employee Handbook on for further guidelines.

If an employee calls out on a scheduled day, they will be charged with personal and/or vacation time for the day. If an employee picks up an extra shift in the same week, they will be paid regular time for the first 40 hours and overtime for time in excess of 40 hours. Under no circumstance shall overtime be paid for the first 40 hours worked in a given week. Personal time off will be calculated using hours as the primary unit (not days or half-days) for all staff, rounded to the nearest hour.

Anniversary Day

On each anniversary of an employee's original hire date, an additional paid eight hours off will be granted. This anniversary day must be approved by the employee's supervisor and must be taken between the anniversary date and the next anniversary date.

Health Benefits

Medical and Dental Benefits

The Guild offers medical and dental benefits to all eligible employees beginning from the first day of employment. These benefits are in the form of insurance or HMO coverage, depending on The Guild's current benefits program. Coverage is available for employees on either an individual or family basis, depending on

eligibility. The Guild and each covered employee share the cost of these benefits in percentages that are determined from time to time and announced to employees. Each eligible employee may obtain a copy of The Guild's health plan summary booklet and/or governing documents from the Human Resources Department or online at the Employee Navigator.

Employees eligible for health insurance benefits must enroll within 30 days from their start date at The Guild and may change their coverage only during the annual election period. If an employee or spouse changes employment status or experiences a significant life event, as defined in the plan, the employee may also make appropriate changes in coverage at that time. An employee who does not wish to be covered by any of The Guild's health insurance programs must sign a statement to that effect (HIRD form), to be included in his or her personnel file. If it is determined that an employee covered by The Guild's health insurance plan is at the same time covered by a health insurance plan provided by his or her spouse's employer, then that employee must reimburse The Guild for all health insurance premiums paid by The Guild on that employee's behalf during the period The Guild's plan was duplicative.

An employee's share of health coverage costs may be funded with pre-tax dollars deducted directly from his or her paycheck. The Guild's share of health coverage costs will be tax free to each covered employee. The Guild will not contribute to the cost of an employee's health coverage while the employee is on certain leaves of absence or after employment has terminated. However, under federal law, employees on a leave of absence and employees who leave employment with The Guild for a reason other than gross misconduct have rights to continue participation (for themselves and their covered dependents) in The Guild's health coverage programs at their own expense.

Life and Disability Insurance Benefits

Employees are offered short-term disability protection as soon as they become eligible (there is a 90-day exclusion). If you decline short-term disability coverage, you may enroll during an annual enrollment period, subject to a 90-day waiting period. Subject to any eligibility rules imposed by the insurance carriers from time to time, employees may change their life insurance and/or disability insurance decisions only during the annual election period. Employees who change employment status or experience a significant life event, as defined in the insurance plans, may also make appropriate changes in life insurance coverage and/or disability insurance coverage at that time.

The Guild's share of life insurance coverage premiums will be tax free to each covered employee up to the cost of the first \$50,000 of coverage. The Guild will

not contribute to the cost of an employee's life insurance coverage while the employee is on certain leaves of absence or after employment has terminated. Premiums paid by The Guild for life and long-term disability insurance may result in additional tax liability to the employee.

Dependent Care Assistance Plan and Flexible Spending

The Guild offers a Dependent Care Assistance Plan and Flexible Spending Account to employees who are eligible. Please contact the Benefits Administrator for more information.

Retirement Benefits

The Guild provides a retirement program for eligible full-time and part-time employees. All employees are encouraged to review the plan summary descriptions, which are provided at the time of employment, for details regarding this program. Temporary, seasonal or any employee who works fewer than 1,000 hours in a year, is not eligible for this benefit.

Employee Savings

Eligible employees may make contributions to their retirement in a 403(b) tax-deferred savings plan. The Guild follows federal and state allowance for amount of savings. These savings are payroll deducted.

The Guild's Contribution

The Guild may or may not make a contribution to employee retirement funds. This is reviewed and determined through the annual operating budget process. Please see the Human Resources Department for current contribution information.

Education Assistance Programs

The Guild supports employees' desire to further their education. The Guild provides financial assistance to eligible employees who attend or have attended externally sponsored educational courses. Such support is intended to enhance employees' professional development and their skills and knowledge related to the work we do at The Guild.

Eligibility

- Active employees must have six months of satisfactory employment at the time of application and must work at least 20 hours per week on a regularly scheduled basis (part-time staff will be eligible for prorated benefits).
- Only those courses or degree programs that, in the opinion of The Guild,

contribute to the development of skill or knowledge applicable to an employee's job responsibilities at The Guild will be eligible for reimbursement under this policy.

- The employee must receive a grade of C or better to receive reimbursement.

Types of Assistance

Assistance when approved is given in the form of a student loan repayment or tuition reimbursement. The benefit may be taxable.

- Student loan repayment program: Employees must present documentation of outstanding loan balance for attendance at an accredited degree-granting institution or program through an authorized school tuition lender.
- Tuition reimbursement program: Courses taken at accredited academic institutions will be eligible for consideration. Correspondence courses or online courses will be considered for reimbursement only from accredited academic institutions and only when they are determined to be equivalent or superior to comparable on-site instruction.

Amount of Benefit

Maximum benefit amounts are determined annually.

Payback Agreement

As a condition of tuition reimbursement, the employee must agree that if s/he voluntarily or involuntarily leaves The Guild, the employee will repay The Guild the full amount of any tuition reimbursements received during the 12-month period preceding the employee's termination date. This payback agreement will not be enforced in situations where the employee's position is eliminated.

Critical Staffing

At its discretion, The Guild may provide additional educational benefits to ensure staffing of certain mission-critical positions. Employees pursuing a Massachusetts teacher certification and certain professional licensures in an accredited program may be eligible to receive additional assistance through the grant/scholarship program. Details are available in the Human Resources Department. Approval for any additional benefits must be approved in advance by the chief executive officer.

Meals

Weekday noontime meals are available to all employees who work at the 521 Virginia Road site Monday through Friday. Breakfast, lunch, and dinner are offered free of charge to residential staff on duty at the times meals are served.

Meal Break Law and Waiver Option

Employees in the Commonwealth of Massachusetts are entitled by law to a 30-minute unpaid meal break for every consecutive six hours worked in a day. To accommodate certain coverage needs, employees may agree to waive this meal break when working on a scheduled shift. It is the employee's free choice to waive a meal break. If an employee waives this break and continues to work, that time will be paid.

Upon hire, employees providing direct care will be provided waiver if choosing to forgo the unpaid break. Employees are free to change their status for meal breaks at any time. If an employee decides to waive the meal break, but then changes his/her mind, the employee must notify the direct supervisor as soon as possible to plan for appropriate coverage.

If an employee chooses to waive this meal break s/he must complete the waiver form and return it to their supervisor and Human Resources Department. If an employee chooses to waive the break, but then revokes the waiver, a new waiver would need to be signed in the future.

If an hourly employee is utilizing their 30-minute meal break:

- That employee will need to punch in and punch out during that time.
- That employee must leave Guild program area during the meal break.
- The break time will be scheduled by the program manager and organized to minimize impact on the setting.
 - For example, day program staff may take their designated break between 10 a.m. - 11 a.m. or 1 p.m. - 4 p.m. to provide for adequate staffing during student lunch, or a residential staff may be scheduled between 4:30 p.m. – 5 p.m. to accommodate community experiences and meals for individuals.
- That employee can work only within the designated shift, i.e. day program staff who work 8 a.m. - 4 p.m. and take 30-minute break resulting in 7.5 hours of paid time. Residential staff working 3 p.m. - 11 p.m. with a 30-minute break would result in 7.5 hours of paid time.
- Shifts cannot be extended without supervisor approval.

Workers' Compensation

Pursuant to state law, employees are covered by workers' compensation insurance for job-related illnesses or injuries. Workers' compensation insurance pays all medical costs and a portion of the employee's regular pay for all approved claims in accordance with Massachusetts law. All employees are eligible for this benefit from the date of employment.

An employee who suffers an accident or injury at work must report the incident to his or her supervisor as soon as possible. If the claim is approved, The Guild's workers' compensation insurance will pay for the treatment. Claims denied under workers' compensation may be covered by short-term disability insurance if the employee is enrolled in the short-term disability plan. Employees who desire specific information about filing for workers' compensation should contact the Benefits Administrator. Accident reporting forms are available in the Human Resources Department and in each residence.

All claims of work-related injury or illness will be investigated thoroughly. An employee who makes a fraudulent claim will be discharged.



Section VI: Workplace Policies

Attendance

Employees are expected to arrive at the job promptly and to be prepared for their assignments at the beginning of their work shift. Employees who will be absent from work are expected to notify and receive confirmation from their immediate supervisor as much in advance as possible. If sudden need arises, then employees must notify supervisors before the beginning of the regular business day or four hours prior to the start of their scheduled shift. The Guild School begins business at 8 a.m. Residential day shifts begin at 7a.m. Advance notice will assist in finding a replacement for the absence. Voicemail and email are not acceptable forms of notification when calling out of work.

Employees with a record of excessive tardiness or absenteeism or with a pattern of absenteeism prior to or following scheduled days off will be subject to disciplinary action. Employees absent from work for three or more consecutive days without notifying their supervisor will be deemed to have voluntarily resigned.

If a work site has a crisis occurring, staff must stay until the situation is resolved. Staff will also be required to stay until the next shift arrives or replacement staff arrives who have been called in by the supervisor or director. The residence or school must be staffed adequately to ensure the safety of the individuals served and other staff in all situations.

Remote Work

The purpose of these procedures is to create a remote work option for employees facing barriers from state/federal travel restrictions, any shelter in place orders put in place by government agencies and to support any initiatives implemented by Guild Chief Officers to establish remote work plans. Any remote work plan should be reviewed on a weekly basis with supervisor.

All remote work plans (and extensions of work plans) should be approved by the employee's chief officer.

Remote work plans are a temporary adjustment to the regular work site. Before authorizing an employee to work from home, supervisors should follow the steps outlined below:

- 1) Confirm the primary responsibilities of the position is achievable by a remote work.
- 2) Job responsibilities: manager and employee will discuss and determine if the job is appropriate for a remote arrangement.
- 3) Determine if the remote work is based on a specific project or ongoing weekly responsibilities:
 - a. Determine scope of project or work.
 - b. Build timelines deliverables.

- 4) Set schedule, e.g. working hours of 8 a.m. – 4 p.m., 9 a.m. – 5 p.m.; or working days with two days on site and three days off site; etc.
- 5) Determine plan of remote communication tools, e.g. phone/email, equipment needs, and designated home work space.
- 6) Determine communication plan for workflow process, e.g. reporting progress/work to supervisor.
- 7) Confirm security, protection of proprietary agency information, and cyber risks, e.g. HIPPA privacy protections, while remote work plan is in place.
- 8) Plan to evaluate and adjust.
- 9) Any overtime accrued in a remote work plan should be approved with written permission.

Inclement Weather

The Guild serves individuals 24 hours per day, 365 days per year. The Guild remains open regardless of weather conditions. As such, all employees are expected to come to work. If weather conditions appear to exist that make transporting individuals served hazardous, the chief executive officer (or designee) may cancel The Guild School's day services. At that time, the chief education officer (or designee) will assign The Guild School staff to support students in residences. Decisions related to an early closing of school will be made by the chief executive officer or her designee.

In the event individuals' day or work programs are cancelled, staff on duty must remain at the residence until they are relieved by incoming staff.

In the event that the Commonwealth of Massachusetts designates a state of emergency and driving ban, office personnel will not need to report to work. Essential personnel (those responsible for supervision of individuals served) must make all efforts to report to work, even in a state of emergency. The Guild will utilize every available measure to support staff safety when a driving ban is in place. The Chief Executive Officer or her designee may close The Guild's administrative offices due to inclement weather.

Secondary Employment

Individuals employed by The Guild may hold outside jobs as long as they meet the performance standards of their job with The Guild. Employees should consider the impact that secondary employment may have on their ability to perform their duties at The Guild. All employees will be evaluated by the same performance standards and will be subject to The Guild scheduling demands, regardless of any outside work requirements. For the purpose of this policy, secondary, part-time positions in other Guild programs are considered "outside employment" and are subject to the same scrutiny as work outside of The Guild.

If The Guild determines that an employee's outside work interferes with their job performance or their ability to meet the requirements of his or her primary job at The Guild (which may be modified from time to time), the employee may be asked to terminate the outside employment if s/he wishes to remain employed with The Guild. Such interference includes calling out absent from the primary job in order to work at secondary employment.

Outside employment that constitutes a conflict of interest is prohibited. Employees may not receive any income or material gain from individuals or organizations for materials produced or services rendered while performing their jobs with The Guild.

English Proficiency

For the health and safety of the individuals in our care, proficiency in written and spoken English is an essential function of all jobs. All methods of communication with individuals in our care, their parents and family members, and co-workers while performing job-related duties are to be conducted in English, which is the language of instruction. The Guild may administer English proficiency exams as part of employment at The Guild.

Drugs and Alcohol

The Guild is committed to maintaining a drug- and alcohol-free workplace. Toward this goal, The Guild will adhere to the following principles:

- All Guild school facilities will be free of the use of alcohol and controlled substances, including legal, illegal and prescription drugs being used without medical supervision.
- All Guild adult residences will be free of the use of controlled substances, including legal, illegal and prescription drugs being used without medical supervision. Alcohol may not be consumed by staff in these residences but may be consumed by individuals who reside in the home if determined to be safe by their treating physician and with the consent of their guardian.
- The unlawful manufacture, distribution, sale possession or use of a controlled substance on Guild premises (including Guild-owned vehicles) or while conducting business on behalf of The Guild is absolutely prohibited.
- Reporting to work under the influence of or impaired by alcohol or a controlled substance is strictly prohibited. As a condition of continued employment, employees convicted of or pleading guilty to (including pleas of no contest) a controlled substance-related violation in the workplace must inform the chief executive officer (or designee) within five days of such conviction or plea. The chief executive officer will have discretionary decision-making ability to suspend employment or require continuing documentation to remain employed.

Violations of this policy will result in immediate termination or other appropriate disciplinary action.

Corporate Compliance Program

Purpose

The Guild is dedicated to providing quality, cost-effective services to the persons that we serve. This Corporate Compliance Program is developed to provide guidance to all employees, contractors and members of the Board of Trustees in following all federal, state and local laws and regulations. The Corporate Compliance Program is developed to demonstrate The Guild's commitment to ethical and legal behavior, as well as honest and responsible provider conduct. This plan, the Employee Handbook and The Guild's program policies communicate the specific standards of expected conduct to all responsible parties.

Scope of the Corporate Compliance Program

The Corporate Compliance Program is designed to identify, prevent, reduce and correct violations of legal or ethical conduct. The essential fundamental elements of the Corporate Compliance Program include the following:

- Implementation of written policies, procedures and standards of conduct and adherence to the Code of Ethical Conduct
- The designation of a corporate compliance officer
- Establishing and maintaining an effective system for lines of communication, including receiving reports of waste, fraud, abuse and other wrong doing
- The development and implementation of regular, effective education and training for all employees, board members and contractors, including the role of the corporate compliance officer, and The Guild's procedures for allegations of fraud, waste, abuse and other wrongdoing
- Conducting internal monitoring and auditing of areas including, but not limited to, the following:
 - Fair labor practices
 - Billing for services
 - Conflicts of interest
 - Enforcing standards through well-publicized disciplinary guidelines
 - Establishing a system for investigation and responding promptly to detected offenses and undertaking corrective actions of identified problems or abuse

Procedures for Corporate Compliance

All Guild employees, volunteers and contractors are required to follow all applicable laws, regulations and Guild policies. All new contractors and employees will be educated about and receive written materials related to The Guild's standards and expected ethical conduct.

Every employee and volunteer will be given the opportunity to read, receive needed clarification and sign the Employee Handbook, which includes information about the role of the chief compliance officer, Whistleblower policy, Waste, Fraud, Abuse and other Wrongdoing policy and procedures, Code of Ethical Conduct policy, and Confidentiality statement.

The Guild will not tolerate violations of the Code of Ethical Conduct policy and procedure, or activities that are in violation of federal, state, or local laws or regulation.

Through the Corporate Compliance Program, The Guild seeks to do the following:

- Empower all responsible persons to prevent, detect, respond to and resolve violations of legal or ethical behavior conducted at or on behalf of The Guild.
- Assure that quality services are provided to persons served.
- Establish systems that allow responsible parties to raise concerns about compliance issues without fear of retribution.
- Provide oversight for the resolution of any identified problems or potential problem areas.

Agency Designations

In order to implement The Guild's Corporate Compliance Program, the corporate compliance officer will be accessible to all Guild board members, employees, volunteers and contractors. The corporate compliance officer will do as follows:

- Develop a system to respond to allegations of illegal and/or improper activities.
- Create procedures to ensure access for persons to make confidential and/or anonymous reports to The Guild's chief executive officer and board related to reports received or identified areas of concern. This information may be provided to the Board in open session, or closed session as allowed by law in the following circumstances:
 - To consult with an attorney
 - To hear or investigate a complaint or charge against a contractor or employee
 - To hear reports concerning alleged criminal conduct
- Provide leadership for the Incident/Accident Investigation Committee (IAIC) and Safety Committee.
- Assist with development of educational program for all existing and new contractors and employees.
- Identify, prevent and correct systemic problems.
- Coordinate the use of audits and/or other techniques to monitor compliance and assist in the reduction of identified problem areas.
- Monitor matters pertaining to corporate compliance.
- Conduct corporate compliance risk assessments.
- Report on matters pertaining to corporate compliance.

The Guild's Program Leadership Team, IAIC, Emergency Preparedness Committee and Safety Committee have the following responsibilities:

- Develop and assist in the implementation of the Corporate Compliance Plan.
- Assess The Guild's existing policies and procedures that address risk areas.
- Recommend and monitor the development of internal systems and controls to carry out The Guild's standards.
- Develop and refine the system to solicit, evaluate, and respond to complaints and problems.

Employee Protection Whistleblower Policy

This policy encourages staff and volunteers to come forward with credible information on illegal practices or serious violations of adopted policies of The Guild, specifies that The Guild will protect the person from retaliation and identify where such information can be reported.

Encouragement of Reporting

The Guild encourages complaints, reports or inquiries about illegal practices or serious violations of The Guild's policies, including illegal or improper conduct by The Guild itself, by its leadership or by others on its behalf. Appropriate subjects to raise under this policy would include financial improprieties, accounting or audit matters; ethical violations; abuse or neglect of a student or individuals we support; or other similar illegal or improper practices or policies. Subjects on which The Guild has existing complaint mechanisms should be addressed using those protocols, such as raising matters of alleged discrimination or harassment via the Human Resource Department, unless those channels are themselves implicated in the wrongdoing. This policy is not intended to provide a means of appeal from outcomes in those other mechanisms.

Protection from Retaliation

The Guild prohibits retaliation by or on behalf of the agency against staff or volunteers for making good faith complaints, reports or inquiries under this policy or for participating in a review or investigation under this policy. This protection extends to those whose allegations are made in good faith but prove to be mistaken. The Guild reserves the right to discipline persons who make bad faith, knowingly false or vexatious complaints, reports or inquiries or who otherwise abuse this policy.

Where to Report

Complaints, reports or inquiries may be made under this policy on a confidential or anonymous basis. They should describe in detail the specific facts demonstrating the bases for the complaints, reports or inquiries. They should be directed to The Guild's chief executive officer or chair of the Board of Trustees. If both of those persons are implicated in the complaint, report or inquiry, it should be directed to The Guild's Board

clerk. The Guild will conduct a prompt, discreet and objective review or investigation. Staff or volunteers must recognize that The Guild may be unable to evaluate fully a vague or general complaint, report or inquiry that is made anonymously.

Conflicts of Interest

Employees may not engage in any business or financial activity or practice that may conflict with the interests of The Guild. A conflict of interest may arise when an employee is placed in a position in which outside business relationships or other business or financial interests may, in the judgment of The Guild, have an adverse effect on the employee's job performance or may otherwise adversely affect the interests of The Guild. In order to avoid conflicts of interest, employees must obtain the written consent of the chief executive officer to engage in any activity as an officer, director, employee, contractor, supplier or consultant with any enterprise that competes or does business with The Guild.

Guardianship of Individuals Served

To avoid any potential conflicts of interest, The Guild strictly prohibits all employees from accepting an appointment as guardian of any current individuals served.

Political Activity

In accordance with federal law, federal funds cannot be used for partisan political purposes of any kind by any person employed in connection with federally assisted programs. Accordingly, The Guild prohibits any political and/or lobbying efforts or activities in the workplace. Employees must adhere to the following guidelines:

- Employees may not involve The Guild in political activities and/or lobbying efforts during or outside of work hours.
- Employees are not to use Guild materials, equipment or letterhead to aid political campaigns, efforts or organizations.
- Employees are not to use Guild affiliations to aid political campaigns, efforts or organizations.
- Employees are not to distribute literature, post flyers or solicit signatures or money to aid political campaigns, efforts or organizations during work hours or in the workplace.

Any violation of these guidelines as set forth may result in disciplinary action up to and including termination of employment.

The Guild recognizes that employees may want to involve themselves as individual citizens in the political process. However, any activity of this nature must take place on the employee's own time and at his or her own expense.

Gifts and Gratuities

The Guild expects its employees to exercise objectivity and good judgment in dealing with The Guild's vendors, suppliers, contractors and agencies. No employee shall accept any gift or gratuity from any person or entity doing business or seeking to do business with The Guild without prior written disclosure to and written approval from the Advancement Office. Employees are not prohibited, however, from accepting advertising novelties such as pens, pencils, calendars, coffee mugs or other gifts of nominal value (less than \$25) when the gift has not been solicited and is not being made in return for special consideration, favor or decision. Employees should notify the Advancement Office of any gifts or donations given so that The Guild can acknowledge the gift and provide a receipt to the donor.

Solicitation

In order to prevent disruption of our operations, ensure a productive working environment and create a caring environment for our clients, we have established the following rules governing the solicitation of individuals and the distribution of materials on The Guild premises. It is the policy of The Guild to prohibit solicitation and distribution on its premises by any person except in accordance with the rules outlined below.

Definitions

"Working time" does not include authorized lunch or break periods, or any other specified non-working periods of the day when you are not in the presence of individuals served or parents/family members or when you are not expected to be performing your job duties or responsibilities, whether such non-work periods are paid or unpaid.

"Working areas" include those areas where employees perform their job duties or responsibilities but do not include locker rooms, employee-only rest areas, employee-only lounge areas or other such non-working areas.

Solicitation of Employees by Other Employees

Employees are permitted to engage in solicitation that is not directly related to work assignments only under the following conditions:

- You may not solicit another employee, for any purpose, when either of you is on working time.
- Solicitation is prohibited in all areas devoted to immediate care of individuals served even during non-working time. These include any area that is used primarily for the care of clients and in which individuals served or their parents/family members are present, including the hallways, corridors and elevators adjacent to such areas.

Distribution of Materials by Employees

Because we must keep working areas clean and free of litter, employees are permitted to engage in distribution of literature or material that is not directly related to their assigned work only under the following conditions:

- Employees may not distribute any literature, notices or other material to other employees, for any purpose, at any time, in working areas or when either of you is on working time, regardless of where you are. Any such activity must take place in non-working areas of The Guild when both employees are on non-working time.
- Distribution of literature, notices or other material is prohibited in all immediate client-care areas.
- Employees may not solicit for any third-party organizations (e.g. Girl Scouts, Avon, Tupperware, etc.) or participation in charity events (e.g. Walk for Hunger, American Cancer Society, etc.).

Posting of Materials by Employees

In each office, The Guild maintains bulletin boards for legal notices only. Employees may not post written materials on these bulletin boards.

Non-Employees

Persons who are not employed by The Guild are prohibited from soliciting, distributing or posting any literature, notices or other material or selling any item to anyone anywhere on Guild property for any purpose at any time. As an employee of The Guild, you may not solicit non-employees on Guild property, distribute any literature, notices or other materials to non-employees on Guild property, or sell any item to a non-employee for any purpose or at any time. Supervisors and managers have the responsibility to inform such non-employees of these rules, pointing out posted signs and, if appropriate, politely but firmly asking such persons to cease their actions and leave the premises or area. If such non-employees refuse to cease such activity, you should contact the Human Resources Department or your division's chief officer.

Official Programs

This policy is not intended to prevent The Guild from carrying on its normal community relations and employee relations programs, which may, from time to time, involve management approval of distributions and solicitations on Guild premises. Programs that have been approved as appropriate recreational or developmental activities for those individuals in our care will continue to be communicated to you in accordance with established practice.

Offensive Materials

Distributing or selling literature or material that is in any way offensive, harassing or discriminatory is not allowed.

Undue Pressure

If you feel that you are experiencing undue pressure from solicitation of any kind, you should contact your supervisor or the Human Resources Department immediately.

No Smoking

Due to federal and state regulations, The Guild is a smoke-free facility. Smoking is not allowed in any Guild facility or at any time in the presence of students or individuals we support. This policy includes all Guild residences and 521 Virginia Road. A designated area where smoking is permitted on the grounds of each location is listed below. Smoking is prohibited in any Guild vehicle. Violation of this policy will result in disciplinary action that could lead to termination of employment.

Designated Smoking Areas

Cedar – bottom of back exit stairs
Chestnut – bottom of rear fire escape stairs
Dogwood – bottom of rear fire escape stairs
Maple – bottom of rear deck stairs
Mulberry – bottom of back stairs
Pine – bottom of deck stairs
Sassafras – by side door
Willow – bottom of side steps

See the Adult Program policy manual for designated smoking areas at each of the adult homes.

Staff may smoke outside the loading dock area at 521 Virginia Road only if the following guidelines are followed:

- Do not, at any time, smoke in the presence of the students or individuals we support. If a student or individual we support is within viewing distance, you must put your cigarette out or, if you have just arrived outside, return at a later time to smoke.
- Before leaving, ensure the students or the individuals we support are supervised adequately.
- The door to the corridor or loading dock area cannot be held open at any time; it must always be fully closed.
- All cigarette butts must be placed in the designated receptacle only. Do not leave them on the ground or put them into the trash. The maintenance crew will empty the receptacle on a regular basis. Do not empty the bucket yourself.
- Enter and exit the receiving area from the corridor only. Passing through maintenance, the kitchen and/or food storage area is not allowed.
- If you are the last one to leave this area, you must make sure the outside door and the corridor door are closed.

- You must always bring your identification badge with you.
- If you forget your identification badge, you must re-enter the building through the south entrance door.

Exit Interviews

The Guild will offer exit interviews to all employees upon completion of their employment with The Guild. At the interview, The Guild will provide information regarding an employee's right to continue health insurance benefits, procedures regarding 403(b) plans (if applicable) and other relevant topics. Employees will have the opportunity to suggest ways The Guild can improve its management, training or other functions.

All Guild property must be turned in to the employee's immediate supervisor on the final day of employment, including staff identification badges, keys and any other Guild property. If this is not done, the employee will be charged for the property in their possession.



Section VII: Personal and Guild Property

Use of Guild Facilities

The Guild vehicles, equipment, materials and supplies are to be used only in connection with The Guild's business. Similarly, The Guild facilities, including the cafeteria, residences and outside grounds, are to be used only for The Guild's business or Guild- sponsored events or in adult residences for activities planned by the individual residents of the home. Employees may not use these facilities for parties, political fundraising events or other private functions. Incidental personal use of Guild vehicles will be considered on a case-by-case basis by the chief executive officer.

Maintenance of Work Areas, Residences and Vehicles

The Guild places a high priority on keeping all premises and vehicles orderly and clean. All employees should attempt to keep work areas, residences and vehicles clear of debris and clutter at all times. Employees should notify the director of facilities of any ongoing or hazardous conditions as soon as possible, as well as any damages or needed repairs.

Use of Information Technologies and Systems

General

The Guild's email, voicemail, telephones, fax machines, mail facilities, photocopy machines, Internet access and computer network are property of The Guild and are for business use. Email and voicemail messages, Internet communications and computer files are part of The Guild's business and client record, and are not to be considered personal records. The Guild reserves the right to have authorized personnel monitor, review, track, record and copy all use, messages, communications and files to ensure security, to deal with technical and business issues, and to prevent abuse. System activity will be monitored for these purposes.

Everyone must use The Guild electronic communications and equipment systems in a responsible, professional and ethical manner. Use of such facilities for purposes inconsistent with The Guild's policies or in violation of the law is not permitted and can be a basis for disciplinary action. Prohibited activities include copyright infringement; invasions of privacy; and displaying or transmitting obscene, threatening, racist, sexist, discriminatory or harassing messages or materials. If you receive a communication containing material you deem to be offensive, please report it immediately to the chief executive officer or the chief financial officer. Do not delete or forward it.

The Guild strongly discourages personal use of these systems. Business uses take priority

and may require restrictions on personal use in addition to those described in this policy.

Archives

All Guild electronic files, including email messages, are archived regularly. Most text and data that has at any time been entered into The Guild computer network can be retrieved.

Users should realize that technology exists that makes it possible to restore some email messages and documents that the user believes have been deleted. A deleted text lingers in the computer's memory until the space it occupies is written over, which happens randomly.

All electronic files, including email, may be subject to discovery and disclosure by adverse parties in litigation. All electronic files, including email, are available to The Guild's management.

Internet

Internet access at The Guild is available at the desktop. The Internet offers unique opportunities for finding information, but is not risk free. Users should be aware of the following:

- Materials available through the Internet vary greatly in quality. Unless material is obtained from a known and reliable source, do not assume that Internet materials are accurate, complete or up to date.
- Internet communications through websites, bulletin boards and the like are not private and should not be used for private communications.
- To avoid viruses and other drains on our system, never download any software from the Internet without the approval from the chief financial officer or designee.
- The Guild's security systems are designed to protect The Guild's records only. The Guild is not responsible for the security of Internet transactions and communications.

Other

To avoid system malfunctions, do not install software of any kind, including screen savers, games or any hardware, without the approval from the chief financial officer. Because The Guild's software is used under licenses, do not copy any of The Guild's software for any purpose.

The Guild recognizes, however, that there may be occasions when employees must make personal use of such equipment. Such use should be kept to a minimum and must not interfere with the employee's work. Residential phone calls, both incoming and outgoing, should be limited to five minutes.

Abuse of The Guild's email, voicemail, telephones, fax machines, mail facilities, photocopy machines, Internet access and computer network for personal reasons may

result in disciplinary action. Employees should reimburse The Guild for all personal long distance calls and fax transmissions, postage and photocopies.

Guidelines for Social Media

Social networks and other online media are popular modes of engagement and two-way communication. Social networks provide great tools that aid communication, outbound marketing, education and collaboration with others. Given the nature of social networking, two-way and real-time communications, these new forums introduce the potential for significant risks associated with inappropriate use. Following guidelines and training, as well as using sound common sense and professionalism, can minimize this risk. The Guild relies on employees to ensure the trust and support of the communities it serves. While The Guild encourages the use of social networking to enhance open communications with several key audiences, we expect these communications will reflect the highest standards of our institution and support the privacy and trust of our students, clients and partners.

Responsibilities

- Follow all applicable policies. This includes, but is not limited, to policies regarding maintaining client confidentiality, professionalism, conduct, ethics, sexual harassment, responsible-use standards, social networking site guidelines, copyright, and intellectual property.
- There is no such thing as a truly "private" social media site: Search engines can turn up posts years after the publication date, comments can be forwarded or copied, and archival systems save information even if you delete a post.
- Be respectful and professional to fellow employees, students, competitors and clients.
- Do not post derogatory comments about any of these groups or anyone else.
- Do not post work-related information that may compromise our organizational practices, client privacy, respect for children and families or security. Take care not to violate intellectual property, copyright or trademark regulations.
- Remember that once you post on social media, you lose a degree of control over your message. Before you post, be certain that you are prepared to share it with a potential audience of millions.
- You are responsible for what you post both on your own site and on the sites of others.
- Individual bloggers have been held liable for commentary deemed to be proprietary, copyrighted, defamatory, libelous or obscene (as defined by the courts).
- Make sure that you have all the facts before you post. Cite and link to your sources whenever possible. If you make an error, correct it quickly and visibly.
- Use good judgment and strive for accuracy in your communications. Errors and omissions reflect poorly on both you and The Guild and may result in liability for either or both parties.

Transparency

- Use your Guild affiliation appropriately. When your connection to The Guild is apparent, make it clear that you are speaking for yourself and not on behalf of The Guild. If you are communicating institutional information through an official channel of The Guild (the official Facebook page, for example), do so only as approved by the chief marketing officer or the chief executive officer.
- If you communicate publicly in an official capacity on the Internet about Guild matters, disclose your connection and role.

Protection of Private Information

Posting, releasing or otherwise disclosing photos, identifiable case descriptions, images, or records on social media of the educational, clinical or research activities of The Guild is prohibited.

Personal Accounts

- For any personal online activity, use a personal email address (not your Guild email address) as your primary means of identification. Just as you would not use Guild letterhead for a letter to the editor with your personal views, do not use your Guild email address for personal views. Similarly, please review the Computer Use policy as it pertains to use of The Guild's computer and network resources for non-Guild use.
- Discussions regarding The Guild's clients, research studies and other protected and proprietary information are prohibited, even if all identifying information is excluded.
- Under no circumstances should photos of clients be displayed unless specific written permission to do so has been obtained and submitted in advance to the chief marketing officer or the chief executive officer.
- If you identify yourself as a member of The Guild community via your personal social media presence(s), please clarify that you are sharing your views as an individual, not as a formal representative of The Guild. In addition, never conceal your identity for the purpose of promoting The Guild through social media.
- It is strictly forbidden to use The Guild's name to promote or endorse any product, cause, political party or candidate.
- Avoid conflicts of interest and maintain a distinction between your personal identity and the identity you represent on behalf of The Guild.

Parking

The Guild makes available certain parking areas, as its resources permit, for the use of employees. When the number of parking spaces is limited, factors such as an employee's travel requirements and seniority may be considered in deciding which employees are permitted to park in The Guild's parking areas.

At 521 Virginia Road, employees may park in any space except the ones marked handicapped, Reserved (for Bay Path University) or admissions visitor. At each

residence, The Guild vehicle is always parked in the driveway.

The Guild is not responsible for damage to personal property, including vehicles. Park at your own risk. In the rare circumstance that a personal vehicle parked at a Guild site is damaged by an individual served by The Guild, the chief operating officer or designee will investigate the situation and determine if The Guild can offer the reimbursement of an insurance deductible up to \$300.00.

Other vehicles may also park in the driveway, as space permits. Local parking laws must be observed. Parking tickets are the responsibility of the individual parking the vehicle. The Guild does not reimburse for traffic violations.

A Parking Memo is posted at each residence with specific guidelines relating to parking at that or other residences. This memo applies to staff, families and visitors. This is to promote good relations with neighbors and comply with city/town regulations.

Guests and Visitors

All visitors to The Guild must sign in at one of the lobby areas upon arrival and sign out when leaving. The same procedure is in place at youth homes. Small children must be supervised appropriately while at Guild facilities. All visitors must receive and wear a visitors' badge while at 521 Virginia Road. Employees should escort all visitors who are not wearing a badge to the lobby areas to receive a badge.

Electronic Device Use

There shall be no cell phone or electronic device use, including text messaging, when transporting individuals served or when driving a Guild vehicle, even if no individuals served are present. If it is necessary to use a cell phone or electronic device in the event of an emergency, the driver should pull over to the side of the road before placing the call.

Personal cell phone or electronic device use is not allowed during work shifts when staff is responsible for supervising individuals served. The use of these devices may distract staff from their primary responsibility, which is making sure the individuals we serve are safe. Personal cell phones or electronic devices must be kept out of sight while staff is responsible for individuals served. They may not be clipped onto a staff members' belt, for instance, because this is a safety risk and increases the likelihood that the item will be damaged. The Guild will not reimburse employees for damage to personal cell phones or electronic devices.

To avoid disruption to co-workers and business activities, all Guild employees must turn off their personal cell phones and electronic devices during staff trainings or other Guild

meetings.

Where job or business needs demand immediate employee access, a business cell phone and/or two-way radio may be issued. For business and tax reasons, the personal use of such equipment is not permitted. Phone records may be audited for compliance.

Employees in possession of Guild cell phones are expected to protect the equipment from loss, damage or theft. Upon resignation or termination of employment, or at any time upon request, the employee must return the equipment.

Guild-Issued Cell Phones

The Guild may issue cell phones to employees whose jobs require them to make calls while away from work or require them to be accessible for work-related matters. Cell phones issued by The Guild remain property of the organization. Employees must comply with The Guild's requests to make their Guild-issued cell phones available for any reason, including upgrades, replacement, or inspection. Employees who leave The Guild for any reason must turn in their Guild-issued cell phones.

Personal Use of Guild-Issued Cell Phones

The Guild-issued cell phones are to be used only for business purposes. Employees are prohibited from downloading apps (free or otherwise) that are not necessary for business-related functions. If you believe you need to download an app in order to perform the duties of your job, please seek written approval from your chief officer. In some instances, The Guild may require installation of certain apps.

Security of Guild-Issued Phones

Employees are responsible for the security of Guild-issued cell phones and the information stored on them. Always keep your cell phone with you when traveling. Never leave it unattended in your car or hotel room. If your Guild-issued cell phone is lost or stolen, notify the Finance Department immediately. Never store confidential information on a cell phone, including protected health information, proprietary materials or human resources documentation.

When using a cell phone, remember that your conversations are not necessarily private. Those around you can hear your end of the conversation. To protect the confidentiality of The Guild's information, please make cell phone calls in a private place. Cell phone transmissions may be intercepted. For this reason, employees should not conduct highly sensitive or confidential conversations by cell phone. If you have any questions about what types of conversations are appropriate for a cell phone and which are not, please ask your chief officer.

All Guild-issued mobile devices, including cell phones, must be password protected and encrypted in accordance with the Health Insurance Portability and Accountability Act (HIPAA) technical standards.

Text Messaging

Text messaging is not a secure form of communication. Text messaging may result in loss or theft of protected health information. As such, The Guild does not permit staff members to send text messages to clients, in accordance with HIPAA privacy rules. In the event that a client provides explicit directions to communicate in this format, Guild staff members will be permitted to schedule appointments or convey other non-clinical information in text messages to that client only. This form of text communication is allowed only with the written consent of the client for a time-limited period and is subject to revocation upon request of the client or The Guild at any time.

Overtime Rules

The Guild's overtime rules apply to any type of work done after hours, including using a Guild-issued cell phone to make business calls. All overtime work -- including such work-related calls -- must be approved in writing in advance. Working overtime without permission violates Guild policy and may result in disciplinary action.

Using Your Personal Cell Phone for Business:

Employees may not use their own personal cell phones to make business calls. At no time should clients have your personal cell phone number. If you feel that you need a cell phone to perform your job, please ask your manager to get you a Guild-issued cell phone or utilize a landline or other approved technology for communication.

Employee Safety and Personal Property

The Guild strives to maintain a safe and secure work environment. Toward this goal, an employee should keep his or her work area safe and clean and should promptly report all unsafe conditions, accidents or other damages to his or her immediate supervisor or the director of facilities. Further, employees should notify a supervisor if they see any unfamiliar individuals in the workplace.

The Guild assumes limited liability for damaged personal items (see Expense and Damage Reimbursement policy). Employees are encouraged to leave valuable personal property at home. Personal property that employees bring to work such as wallets and purses should be stored in a safe place.

Expense and Damage Reimbursement

The Guild will reimburse employees for reasonable and necessary out-of-pocket expenses incurred in connection with required or authorized travel, including

attendance at approved conferences, conventions, seminars and other educational functions. Reimbursable expenses include transportation, meals, lodging and registration fees, and conference materials. All expenses must be substantiated with receipts. All reimbursement requests must be received within 15 days of the end of the month of the incurrence to be reimbursed or the request may be denied.

Employees required to use their personal car for Guild business (other than commuting) will be reimbursed at The Guild's current rate per mile to cover the cost of gasoline, oil depreciation and insurance. They also will be reimbursed for parking fees and tolls with receipts. Mileage sheets must be turned in within 15 days of each month's end or the request may be denied. Any fines incurred by an employee due to driving or parking violations are the responsibility of the employee and are not reimbursable. All claims for reimbursement must be approved by the employee's immediate supervisor before they are submitted to the director of human resources for payment.

Employees should be aware of the inherent risk involved when wearing certain types of clothing or jewelry (see Personal Appearance policy). The Guild will reimburse employees in the following amounts for the damage or destruction of their personal property by individuals served in the course of the employee's performance of day or residential duties:

Prescription Eyeglasses

The lesser of the actual costs of repair or replacement not to exceed \$200 for frames. The lesser of the actual costs of repair or replacement of lenses not to exceed \$150. This is a one-time reimbursement per fiscal year. Eye examinations are excluded as a reimbursable expense as related to the replacement of eyeglasses that are damaged or destroyed.

Each Single Article of Clothing

The lesser of the actual cost of repair or replacement or \$50. The damaged article must be turned in to your supervisor prior to reimbursement.

Personal Electronic Devices

The use of personal electronic devices is prohibited (see Electronic Device Use policy), therefore The Guild will not reimburse employees for damages to their personal electronic devices.

Requests for Reimbursement

In order to qualify for reimbursement for damages to personal property, the incident that caused the damage must be reported, in writing, within three working days to the employee's immediate supervisor and the director of human resources.

The damaged or destroyed item must be turned in to the Human Resources

Department when requesting reimbursement.

Repairs or replacements must be completed within 30 days from the date of confirmation of the incident by the director of human resources.

Subsequent requests for reimbursement for damages to personal property as outlined in this policy by current or former employees will not be honored if the employee failed to perform any of the steps described in this policy.

Use of Guild Vehicles

The Guild has specific procedures governing the sign-out, use and maintenance of all Guild vehicles. Employees are expected to follow those procedures at all times. Only authorized employees may use Guild vehicles. Vehicles may be used for Guild purposes only. Infrequent, incidental personal use of Guild vehicles with the chief executive officer's authorization may be permitted in certain circumstances.

Employees whose jobs duties require the driving of Guild vehicles must have a valid driver's license. Temporary or suspended licenses must be reported to your supervisor and the Human Resources Department immediately. At date of expiration, the Human Resource Department will request a current copy of each employee's renewed license. Employees who use Guild vehicles in the course of their job duties are expected to exercise care, perform required maintenance and follow all operating instructions, safety standards and guidelines. Employees must notify the appropriate supervisor, the director of facilities and the human resources department if any vehicles appear to be damaged, defective or in need of repair, regardless of the cause of the damage. Any vehicle repair needs should be written up on a maintenance request form and given to the receptionist. If you are involved in a car accident with a Guild vehicle, you must fill out an accident report immediately. These reports are attached to each vehicle clipboard and available from the receptionist. Completed reports need to be returned to the program administration as soon as possible.

Driver's Responsibilities

Drivers of Guild vehicles are required to do the following:

- Report **immediately** any change in safe driving history to the Human Resources Department. If the license is revoked or suspended, operating privileges will be terminated.
- Wear seat belts at all times and require passengers to wear them. Under no circumstances should the number of passengers exceed the number of seat belts.
- Possess the legal class license required for the vehicle being driven.
- Do not allow drinking of alcoholic beverages and/or use of controlled substances in a Guild vehicle at any time.
- Smoking is not permitted in any Guild vehicle.
- Drivers of Guild vehicles cannot be under the influence of controlled substances

and/or alcohol.

- Drivers must operate Guild vehicles in accordance with applicable local and federal laws and Guild regulations.
- Never transport passengers, including hitchhikers, family members and friends, for unauthorized use.
- Do not use hands-free technology with cellular phones.
- Texting and other use of electronic devices while driving is strictly prohibited.
- Avoid conditions that can cause the loss of control: of the vehicle, including driving while sleepy or inattentive; driving too fast for road conditions; or engaging in activities such as cell phone use.
- Immediately report all accidents to The Guild's Facilities Department
- Traffic or parking violations and citations incurred while driving on Guild business are the sole responsibility of the driver.

An employee who engages in improper, careless, negligent, destructive or unsafe use or operation of vehicles or who receives excessive traffic and/or parking citations may be subject to disciplinary action. Employees are obligated to pay any fines they are assessed for motor vehicle citations.

Use of Personal Vehicles

An employee who wishes or plans to transport individuals served in his or her personal vehicle must provide The Guild with current evidence of personal automobile insurance coverage with the limits as follows: injury per person, \$100,000; injury per accident, \$300,000; and property damage, \$5,000.

Keys

Upon commencement of employment, new employees will receive key-card access and keys as needed to The Guild premises. Individuals residing in adult residences will also be given keys to the residence when they move in.

Employees or residents of adult homes may not give or lend their keys to any other person, including other employees. Furthermore, employees may not make copies of Guild keys. Lost or stolen keys should be reported immediately to the chief financial officer. Failure to return keys upon termination will result in a charge of \$20 per key.

Employee Identification Badges

Each employee will be given an employee identification badge. For security purposes, employees should wear their badges so they are visible at all times during the workday and while on Guild property. Employees working during evenings and weekends will need

to use their badges to enter and exit Guild buildings. Lost or stolen badges should be reported immediately to the director of administration. Employees who lose their badges will be allowed one replacement at no charge. After that, a \$10 charge will be assessed. Upon separation of employment, badges must be returned to The Guild.

Security Cameras

To promote the safety of all individuals served, The Guild uses security cameras in The Guild hallways, corridors and other common areas of The Guild School and youth residences.

Corporate Credit Card

The Guild provides select employees with corporate credit cards for the purpose of conducting The Guild's business. Corporate credit card user and credit limit approvals are at the discretion of the chief financial officer and chief executive officer.

All corporate credit cards are the property of The Guild and authorized users shall take the necessary precautions to ensure the safekeeping of the card. Each cardholder must read and sign a statement agreeing to adhere to the corporate card policy. Corporate credit cards may not be used for personal expenditures of any kind. No cash advances are allowed. Receipts are required for any expense. Confirmation statements, shipping receipts or similar reports may be used to document telephone orders or fax orders. Any exception shall be explained in writing and signed. Reports will be reviewed for validity and accuracy by the chief financial officer or director of finance prior to being paid.

Any employee detecting improper card use (e.g. overdue expense reports or use for non-business expenses) will report the information, in confidence, to the chief financial officer. In the event that the cardholder is the chief financial officer, the employee should bring the information to the chief executive officer's attention. Card holders will be responsible for reimbursing The Guild for any unauthorized charges including tax.

Intellectual Property

This policy governs the handling of inventions, copyrightable works, and other intellectual property and tangible research property made by individuals involved in educational, research, clinical or other activities associated with The Guild, including employees, volunteers, contractors and subcontractors.

Most copyrightable works and virtually all other intellectual property created by an employee, volunteer or contractor as a function of their association with The Guild are owned by The Guild. Employees are not authorized to sign, and should not sign, confidentiality agreements, license agreements, material transfer agreements, research

agreements or any other agreements that may restrict, commit or affect intellectual property they create while employed by or otherwise affiliated with The Guild.

Individuals should take no action to sell, license or otherwise commit or dispose of intellectual property they create unless and until such action is approved by the chief operating officer or the chief executive officer. Generally, approval will be given for individuals to take such actions on their own only if and after the chief operating officer or the chief executive officer determines that the individual owns the intellectual property. Moreover, prior to using The Guild name in any publication, the individual must request and receive agency approval in writing from either the chief operating officer or the chief executive officer. All research undertaken at The Guild is subject to the Human Subject Research policy.

Individuals should be aware that consulting agreements, in the form proposed by companies, school districts, individual contractors or other third parties, may contain provisions that are inconsistent with this Intellectual Property policy as well as other policies of The Guild. Therefore, individuals are required to submit all consulting agreements to the chief executive officer, chief operating officer or chief financial officer for approval.



Section VIII: Leaves of Absence

Family and Medical Leave

In compliance with the Family and Medical Leave Act of 1993 (FMLA), The Guild will grant up to 12 weeks of unpaid leave during a 12-month period to an eligible employee for one or more of the following reasons:

- For incapacity due to pregnancy, prenatal medical care or child birth
- To care for the employee's child after birth, or placement for adoption or foster care
- To care for the employee's spouse, son or daughter, or parent who has a serious health condition
- For a serious health condition that makes the employee unable to perform the job.

Military Family Leave Entitlements

Eligible employees with a spouse, son, daughter or parent on active duty or called to active duty status in the National Guard or reserves in support of a contingency operation may use their 12-week leave entitlement to address certain qualifying exigencies outlined in the posted FMLA regulations.

Requirement to Use Paid Leave

If an employee wishing to take family or medical leave is entitled under existing Guild policy to take paid leave (for example, vacation, personal, family or sick leave), The Guild will require that all available paid leave be taken and exhausted concurrently with family or medical leave before unpaid leave may be used. For example, present Guild policy allows employees to take paid sick leave when they have a serious health condition that prevents them from working. Therefore, employees with such a condition must exhaust all accrued paid sick leave to which they are entitled during the family or medical leave period and then take unpaid leave for the balance of the 12-week leave period. However, an employee who takes leave in order to care for the employee's seriously ill parent, spouse or child would not be required (or allowed) to substitute any accrued paid sick leave available to the employee because Guild policy does not permit the use of sick leave for that purpose.

Employees Who Are Eligible

Employees are eligible to take family or medical leave only if they have worked for The Guild for at least 12 months and for at least 1,250 hours over the previous 12 months and only if there are at least 50 employees of The Guild within 75 miles.

Meaning of 12-Month Period

The 12-month period during which an eligible employee can take a leave under this policy is measured backward on a rolling basis from the date when an employee uses any such leave. An employee's leave entitlement consists of any balance of the 12 weeks that has not been used during the immediately preceding 12-month period.

Advance Notice Requirement

Whenever the need for leave is foreseeable, an employee must give The Guild at least 30 days' advance notice before leave will commence. A form for requesting leave is available from the Human Resources Department. When the need for leave is not foreseeable 30 days in advance, an employee must give notice to The Guild within two working days of learning of the need for leave, absent extraordinary circumstances. If an employee knew about the need for leave but failed to give timely notice to The Guild, The Guild may deny the taking of leave until 30 days after the date of the employee's request.

Mandatory Medical Certification

Any employee requesting leave because of a serious health condition of the employee or family member must furnish The Guild with appropriate medical certification. The certification must be signed by the appropriate healthcare provider on the form provided by the Human Resources Department. Employees should submit the medical certification form along with their leave request. The Guild may deny the taking of leave until the required certification is provided. In cases of unforeseen leave, medical certification must be submitted to The Guild as soon as possible. The Guild may, at its discretion, require any employee seeking leave because of a serious health condition to obtain a second or third opinion at The Guild expense.

When an employee is on leave, subsequent recertification of a medical condition must be submitted to The Guild every 30 days or when The Guild requests certification in appropriate circumstances, such as when an employee seeks to extend the leave or there is a change in the serious health condition for which the leave is taken.

Intermittent or Reduced Leave

When medically necessary, an employee may take intermittent leave (two or more separate leave periods) or reduce" leave (where an employee continues to work, but for fewer hours per day or per week). In such cases, the total number of hours or days of leave taken by the employee is limited to the equivalent of 12 work weeks. Employees must make a reasonable effort to schedule the leave in a manner that will not unduly disrupt The Guild's operations. The Guild may transfer an employee to an available alternative position with equivalent pay and benefits for which the employee is qualified if that position can accommodate recurring periods of leave better than the employee's regular job.

Benefits

Employees who take leave will not lose employment benefits that were accrued prior to the date the leave commenced. However, employees will not accrue seniority or benefits during unpaid leave. With the exception of health insurance coverage (see

below), no employee benefits will be provided by The Guild while an employee is on unpaid leave.

Health Insurance Coverage

Employees who are out on leave will be kept on The Guild's group health insurance plan at the same level, with the same coverage and under the same conditions as if they had not taken leave. For employees on paid leave, their share of premium payments will be deducted from their salary in the usual manner. Employees on unpaid leave are responsible for making timely payments to The Guild for their share of premium payments, in accordance with the schedule established by The Guild before unpaid leave commences, in order to avoid cancellation of their coverage.

If an employee fails to return to work at the end of the leave period and the failure to return is not due to circumstances considered beyond the employee's control, the employee must reimburse The Guild for health insurance premiums paid by The Guild while the employee was on leave. The Guild will require sufficient medical certification of an employee's inability to return to work because of a serious health condition before the employee will be released from the requirement to reimburse The Guild for health insurance premiums paid during the employee's leave period.

Employee Reporting Requirements During Leave

Employees on leave must report to The Guild every 30 days on their status and intent to return to work. The Guild's obligations under the Family and Medical Leave Act of 1993 cease when an employee gives The Guild notice of his or her intention not to return to work.

Medical Certification of Fitness to Return to Work

If, in The Guild's judgment, an employee's serious health condition poses a significant risk of substantial harm to that employee or others, The Guild may require the employee to obtain medical certification of his or her ability to perform the essential functions of the employee's position. The Guild will notify the employee if such certification is required before the employee will be permitted to return to work.

Restoration to Position

Upon return from leave, employees will be restored to either the same position they held when the leave commenced or to an equivalent position with equivalent employment benefits, pay, and other terms and conditions of employment. However, this guarantee of restoration shall not apply to certain highly compensated employees if necessary to avoid substantial and grievous economic injury to The Guild's operation.

Maternity/Paternity Leave under Massachusetts Law

A full-time female employee who is ineligible for maternity leave under the Family and Medical Leave Act but who has completed at least three months of employment may be entitled to eight weeks of maternity leave for the purpose of giving birth or adopting a child under 18 years of age or under 23 years of age if the child is mentally or physically disabled. Paternity leave follows these same guidelines. If an employee is entitled to take family or medical leave under federal law and maternity leave under state law at the same time, the two leave periods will run concurrently (not be added together) and the above requirements for family and medical leave will apply.

If an employee is entitled to take maternity/paternity leave under the state law alone (either because s/he is not eligible under the federal Family and Medical Leave Act or because s/he has already exhausted her 12 weeks of family or medical leave under the federal law), the employee must give the chief executive officer or the Human Resources Department at least two weeks' notice of her or his anticipated date of departure and intention to return to work. Maternity/ paternity leave will be without pay, except that accrued sick leave and disability benefits can be applied during maternity leave for pregnancy and childbirth-related disabilities under the same terms and conditions that apply to other temporary medical disabilities.

At the conclusion of maternity/paternity leave, the employee will be reinstated to her or his previous or a similar position with the same salary that s/he received at the commencement of the leave. The Guild, however, reserves the right not to reinstate an employee on maternity/ paternity leave to her previous or similar position if other employees of equal seniority and status in the same or similar position have been laid off due to economic conditions or have been otherwise affected by changes in employment conditions during the period of the maternity/ paternity leave. A maternity/paternity leave shall not affect the employee's right to receive vacation time, sick leave, bonuses, advancement seniority or other benefits for which s/he was eligible at the date of leave, but unpaid maternity/paternity leave time shall not be included in the computation of such benefits.

Massachusetts Family Medical Leave Law, M.G.L. c.175M

MGL c.175M as added by St. 2018, c.121 establishes a system for paid family leave of up to 12 weeks to care for a family member and up to 20 weeks for your own illness. The tax that pays for it begins in 2019, and leave will be available beginning in 2021.

Beginning Jan. 1, 2021

- Employees may be entitled to up to 12 weeks of paid family leave in a benefit year for the birth, adoption or foster care placement of a child, or because of a qualifying exigency arising out of the fact that a family member is on active duty or has been notified of an impending call to active duty in the Armed Forces.

- Employees may be entitled to up to 20 weeks of paid medical leave in a benefit year if they have a serious health condition that incapacitates them from work.
- Employees may be entitled to up to 26 weeks of paid family leave in a benefit year to care for a family member who is a covered service member undergoing medical treatment or otherwise addressing consequences of a serious health condition relating to the family member's military service.

Beginning July 1, 2021

- Employees may be entitled to up to 12 weeks of paid family leave in a benefit year to care for a family member with a serious health condition.
- Employees may be eligible for up to 26 total weeks, in the aggregate, of paid family and medical leave in a single benefit year.
- An employee's weekly benefit amount will be based on the employee's earnings, with a maximum benefit of \$850 per week.

Job Protection

Generally, an employee who has taken family or medical leave under the law must be restored to the employee's previous position or to an equivalent position, with the same status, pay, employment benefits, length-of-service credit and seniority as of the date of leave.

Continuation of Health Insurance

The employer must continue to provide for and contribute to the employee's employment-related health insurance benefits, if any, at the level and under the conditions coverage would have been provided if the employee had continued working continuously for the duration of such leave.

No Retaliation

It is unlawful for any employer to discriminate or retaliate against an employee for exercising any right to which such employee is entitled under the paid Family and Medical Leave Law. An employee or former employee who is discriminated or retaliated against for exercising rights under the law may, not more than three years after the violation occurs, institute a civil action in the Superior Court.

Employer/Employee Contributions to the DFML Family and Employment Security Trust Fund

On October 1, 2019, contributions to the Department of Family and Medical Leave (DFML) Employment Security Trust Fund began. An employer will be responsible for sending contributions to the DFML for all employees.

Currently, the total contribution amount is 00.75% of wages. Of that 00.75% total contribution amount, there is a split: 17.3% is a family leave contribution and 82.7% is a medical leave contribution.

Under the law, employers are responsible for a minimum of 60% of the medical leave contribution (.372% of wages), but are permitted to deduct from employees' wages up to 40% of the medical leave contribution (.248% of wages) and up to 100% of the family leave contribution (.13% of wages).

The Guild will comply with the required contribution amount and will determine annually if it will make additional contributions.

How to File a Claim

Employees must file claims for paid family and medical leave benefits with the DFML using the Department's forms. Forms and claim instructions will be available on the Department's website www.mass.gov/DFML before January 2021.

Employees are required to provide at least 30 days' notice to their employer of the anticipated starting date of any leave, the anticipated length of the leave and the expected date of return. An employee who is unable to provide 30 days' notice due to circumstances beyond his or her control is required to provide notice as soon as practicable.

Payment for Concurrent Leave

Any paid leave provided under a collective bargaining agreement or employer policy and paid at the same or higher rate than paid leave available under this law shall count against the allotment of leave benefits available under this law.

Department of Family and Medical Leave (DFML) Contact Information

The Massachusetts Department of Family and Medical Leave
Charles F. Hurley Building
19 Staniford Street, 1st Floor
Boston, MA 02114
(617) 626-6565
www.mass.gov/DFML

More Information is Available

For more detailed information, please consult the Department's website:
www.mass.gov/DFML.

Necessities Leave

Eligible employees may take a total of 24 hours of unpaid leave during the previously specified 12-month period to participate in school or day-care activities that are directly related to the educational advancement of the child, accompany a child to routine medical or dental appointments or (accompany an elderly relative to routine medical or dental appointments).

An eligible employee is an employee who has worked for The Guild for a total of at least 12 months (whether consecutive or nonconsecutive) and for at least 1,250 hours of service within the immediately preceding 12-month period, and only if there are at least 50 employees of The Guild within 75 miles.

The 24-hour leave may be taken intermittently or on a reduced leave schedule. If an employee wishing to take necessities leave is entitled under existing Guild policy to take paid leave (for example, vacation, personal, family and medical or sick leave), The Guild will require that all available paid leave be taken and exhausted before unpaid necessities leave may be used. If the necessity for the leave is foreseeable, an employee is required to provide The Guild with at least seven days' notice before the date the leave is to begin. If the necessity for the leave is not foreseeable, then the employee must provide such notice as is practicable.

Upon request by The Guild, an employee must provide written certification from an appropriate person or entity certifying the basis for the requested necessities leave. Such certification shall be in the form provided by The Guild.

Jury and Witness Duty

Non-exempt full-time employees who are summoned to serve on a jury will be paid by The Guild for the first three days of jury service at their regular rate of compensation. Thereafter, The Guild will make up the difference between the rate paid for jury service and their regular rate of compensation up to 30 days in a year.

Exempt employees will be compensated at their regular daily rate for any week in which they are on jury duty and perform any work for The Guild. An exempt employee who performs no work for The Guild during any week that the employee is on jury duty will be compensated for the week and reimburse the court compensation amount to The Guild.

Employees are expected to report to work if they are released from jury duty before 1 p.m. Employees called for jury duty must give their supervisor a copy of the jury summons as soon as possible after receiving it. Employees are expected to keep their

supervisor informed of the anticipated length of their jury service. Time spent on jury duty does not count for purposes of computing overtime.

Employees subpoenaed to appear as a witness in a trial may use accrued vacation to cover their absence. Employees who have no unused, accrued leave may take unpaid leave for the purpose of complying with the subpoena. Employees subpoenaed to be a witness in a trial must give their supervisor a copy of the subpoena as soon as possible after receiving it and are expected to make a reasonable effort to minimize the duration of their witness leave. Exceptions will be dealt with by the chief executive officer.

Military Leave

The Guild provides unpaid leaves of absence to the extent required by law to employees who leave The Guild's employment to join the armed forces of the United States (including the reserves) for active duty or for training.

Employees called to active duty must notify their supervisor and the director of human resources in writing, before they leave for active duty, of their expected dates of leave from and return to The Guild. An employee may be eligible for re-employment to the position that the employee held prior to entering the armed forces, or to a position of similar seniority, status and pay, provided that the following apply:

- The employee was discharged or released under honorable conditions.
- The employee is qualified for the job.
- The employer's circumstances have not so changed as to make it impossible or unreasonable to rehire the person.
- The employee's total service in the armed forces is no more than five years (except for additional amounts required by law); and
- The employee applies for re-employment within 90 days of the conclusion of military service.

Re-employed persons are considered to have been on a leave of absence during their period of military service and are eligible for all benefits offered to others returning from a leave of absence.

Employees who are required to miss work to fulfill their military training obligations (including annual reserve training) may take unpaid leaves of absence for that purpose. Employees who learn that they must attend military training must notify the Human Resources Department in writing, in advance of their training, of the expected duration of the training and their anticipated date of return.

The complete posting of employee rights under the Uniformed Services Employment and Reemployment Rights Act are posted in the main notice bulletin cabinet at the end of the Conference Room<what conference room> in the school.

Bereavement Leave

In addition to the personal time off described above, The Guild provides full-time employees with up to 32 hours per occurrence of bereavement time off in the event of a death in an employee's immediate family. Immediate family is defined as spouse, domestic partner, child, parent, spouse's parent, grandparent, sibling or step-family members.

In the event of death in an employee's immediate family, the employee must use personal time for up to three working days. Employees may, with the approval of their supervisor, extend this leave by using accrued paid vacation time.

Limitations on Leaves of Absence

Employees on leave of absence are expected to periodically, at least once a month, keep The Guild informed of their status and intention to return to work and to respond promptly to any request by The Guild for such information. Except in extraordinary circumstances or as may otherwise be provided by law, employees will not be allowed to remain on leave for more than 12 weeks. This period may be extended by permission of the chief executive officer or the Human Resources Department. Employees who do not satisfy the requirements of this policy or do not return to work within 12 weeks of the commencement of their leave shall be discharged.



Section IX: Communication Between The Guild and Employees

Supervision

Receiving supervision is an essential part of your work within this organization. We provide it as a support to help you do your job most effectively. This document provides you with information about the nature of supervision, including your responsibility and rights.

Purpose of Supervision

Supervision is a collaborative process focused on four major goals:

- Ensuring the quality of care provided and helping you to strengthen the quality of your work
- Ensuring that administrative tasks are completed accurately and on time. This could include documentation, treatment plans and time sheets
- Providing support to you in your job and as you face work-related challenges
- Helping you grow and develop your skills

Your Supervisors

You may have one or more supervisors. If there is more than one, each supervisor will describe their role to you. Ask your supervisor(s) to clarify if you are ever uncertain about who to go to for specific tasks.

Frequency, Length and Format

Your supervisor will inform you about his or her expectations about the frequency, length, and format of supervision. It is each supervisor's responsibility to meet those expectations. It is your responsibility to participate in the supervision offered. Please notify your supervisor, in advance, if you are unable to attend a supervision session. Try to reschedule.

Supervisors' Qualifications

Your supervisor is qualified to supervise all or part of your work. Supervisors may describe their educational background, work experience and areas of expertise. If they do not describe their experiences, you may ask them to do so. A supervisor might ask you to consult with other individuals in the organization who have unique qualifications on certain topics.

Content of Supervision Sessions

Each supervisor approaches the supervision process in different ways. In general, you are expected to be an active participant in supervision and prepared to review your work.

You should make sure to discuss significant:

- Risk or legal issues
- Changes in status (e.g. acute illness, hospitalization, loss of housing, arrest)
- Difficulties for you to work with
- Difficulty making progress in your assigned work

Please alert supervisors about clients who have voiced concerns about your work, including formal and informal complaints. Your supervisors are legally and professionally responsible for your work, so you must inform them of the critical types of information described above.

Your supervisor will provide you with expectations and instructions regarding issues such as caseload size, productivity, documentation and scheduling. You can also expect periodic discussion regarding your performance, learning needs and opportunities for continuing education. As supervision is a collaborative process, you are expected to raise with supervisors any concerns you have about your job, relationships with other employees, other parts of your work life or specific supervisory decisions. In all cases, you are ultimately responsible for following a supervisor's legal instructions and direction about your work.

Evaluating Performance

A specific role for supervisors is to help you identify your work-related strengths and learning needs and to help you improve your skills. They have an obligation to provide you with constructive feedback throughout the year and to periodically complete a written performance evaluation. You will have the opportunity to discuss the evaluation with your supervisor and to comment on it in writing. You will receive a copy of the performance evaluation.

Confidentially and Its Limits

Much of what is discussed in supervision will not be shared with others and your supervisors have an obligation to handle sensitive information carefully. However, it cannot be assumed that the information discussed in supervision is confidential because it may be shared or used for a number of reasons. Some examples include coordinating treatment; crisis intervention; mandated reporting of client risk to self or others; and performance reviews or personnel-related actions. You are expected to report client-related information to your supervisor(s), especially when risk to the client or others is involved.

Dual Relationships

Having a personal or business relationship with a client, in addition to your treatment relationship, is prohibited by ethical codes and guidelines. If for any reason you find yourself in such a situation, you must bring this to the attention of your supervisor. In a similar way, supervisors are not to provide employees with psychological counseling or therapy. You may talk with them about how personal issues are impacting your work and they may assist you in accessing resources or supports to help with those problems. Supervisors must pay close attention to dual relationships with their supervisees, especially when friendships existed prior to the supervisory relationship.

Your Rights

You have the right to be treated by all employees of this organization as an individual – with respect, dignity and cultural sensitivity. No employees, including your supervisors, have the right to abuse, sexually harass or exploit you.

Appeals Process

You are encouraged to let a supervisor know if they are not meeting your supervision needs or if there is a problem, from your perspective, with the supervisory relationship. Similarly, if you are dissatisfied with a performance review given to you by a supervisor, please discuss it with them. If these discussions do not resolve your concerns, your supervisor can direct you to his or her supervisor or to someone in the Human Resources Department. If you would like more information, please see the human resources director or consult the Employee Handbook.

Discipline

The Guild expects all employees to be aware of and to follow workplace policies and rules for the well-being of the individuals served, fellow employees and business operations. There are many organizational, divisional and departmental policies and rules at The Guild. Employees are expected to comply with these internal rules as well as requirements from federal, state and local laws, and funding and accreditation agencies.

The Guild utilizes a progressive discipline approach to identify and address employee and employment-related problems. Progressive discipline is a step-by-step process designed to modify unacceptable employee behaviors, which also allows for discipline to start at a higher step based on the severity and circumstances of the situation, including immediate termination of employment when appropriate.

Of course, no discipline policy can be expected to address each and every situation requiring corrective action that may arise in the workplace. The Guild reserves the right to take any legal action necessary to address the issue at hand, including immediate termination when warranted. Therefore, The Guild takes a comprehensive approach regarding discipline and will attempt to consider all relevant factors before making decisions regarding discipline.

Probationary employees are held to the highest standards for behavior and job performance. Progressive discipline is the exception rather than the rule for probationary employees.

Progressive Discipline Process

The Guild will adhere generally to the following progressive disciplinary process:

1. **Verbal Warning:** An employee will be given a verbal warning when an employee engages in unacceptable behavior. Verbal warnings shall be documented in

supervision records.

2. **Written Warning:** A written warning is more serious than a verbal warning. A written warning will be given when an employee engages in conduct that justifies a written warning or the employee engages in unacceptable behavior during the period that a verbal warning is in effect.

The written warning will specifically outline the incident or offense, date, time, place and witnesses, and will include a warning that any further violations of rules will result in either a suspension or termination (whichever is appropriate). The employee shall be requested to acknowledge receipt of the written warning by signature. A copy of this signed document will then be presented to the employee. Written warnings shall be placed in the employee's personnel file

3. **Suspension:** A suspension is more serious than a written warning. An employee will be suspended when s/he engages in conduct that warrants an investigation. Suspension action must be coordinated with the Human Resources Department prior to implementation.
4. **Termination:** An employee will be terminated when s/he engages in conduct that justifies termination or does not correct the matter that resulted in less severe discipline.

Again, while The Guild will take disciplinary action in a progressive manner when appropriate, it reserves the right, at its sole discretion, to decide whether disciplinary action will be taken in a given situation. In this regard, an employee failing to comply with the mandated reporting requirements will be terminated without first receiving lesser levels of discipline.

Employee Concerns

The Guild is committed to treating all employees fairly. Any employee who feels that s/he has not been treated fairly may request a meeting with his or her supervisor to help resolve the issue. Employees not satisfied after the discussion with their supervisor may request that the next higher level of management review the problem. Any employee who remains dissatisfied may appeal to the highest appropriate level of management. The decision of that level of management will be final.

Nothing in this section shall prohibit lawful reporting of abuse or neglect of individuals served or negate employee rights outlined in the Employee Protection Whistleblower policy. If an employee is reluctant to raise concerns with a supervisor or is not satisfied with the supervisor's response, The Guild provides several options for employees to raise concerns, including the option of raising a concern anonymously through the Whistleblower Policy.



Section X: Health and Safety

Emergency Medical Supplies

All residences, the school program and vehicles will maintain first aid supplies. First aid supplies will include, but are not limited to, bandages, gloves, gauze, adhesive tape, hydrogen peroxide or other cleaning solutions

- In the residences, first aid supplies will be in a locked storage unit on each floor.
- At the 521 Virginia Road site, first aid supplies will be maintained in the nursing suite, staff lounge, the cafeteria, the student lobby desk and visitor lobby desk, and in the physical education area.
- Each Guild vehicle will have a first aid kit in the glove compartment. An employee who is injured at work and requires more extensive medical treatment should immediately notify his or her supervisor or, if the supervisor is unavailable, a fellow employee.

An employee must report all injuries, regardless of severity, to his or her supervisor. If you see or are involved in an accident or emergency:

- Don't panic.
- Use common sense.
- If the emergency seems severe or urgent, dial your facility's emergency number or an ambulance service, and/or contact the on-call supervisor.
- In less urgent situations, alert your supervisor and wait for specific instructions on how to proceed.
- For dealing with blood borne pathogens (BBP), a bio-box is located in each residence and in classrooms with red dots on the closets. The BBP policy is distributed during annual training and a copy is available in the procedures manual in each residence.
- If the injury is workers' compensation-related, see section on Workers' Compensation for reporting of injury.

Automated External Defibrillation

The Guild recognizes the importance of having medical emergency equipment ready should a need arise. The Guild headquarters and school building has an Automated External Defibrillator (AED), which is capable of assisting to save lives by way of an electric shock to a heart that has stopped beating.

- The Guild has a Limited Public Access Defibrillation Program with the Automated External Defibrillation (AED) located at the front desk at the student entrance lobby.
- The Limited Public Access Defibrillation Program at The Guild meets the requirements of the Mass General Laws c112 section 12V1/2 relating to public access defibrillation programs, as written and amended in the future.
- The Guild follows the protocol and procedures developed by ENPRO, The Guild's

AED overseer. Notification was made to The Guild's medical advisor and the insurance carriers concerning the implementation of an AED program.

- All staff who are currently trained and certified in CPR and AED are designated AED providers at The Guild and can use the AED.
- The AED device will be checked regularly per the ENPRO specifications.
- Any problems with the AED device will be reported to the AED coordinator, who is part of the Training Department.

Worker Injury Protocol

What to Do if Injured at Work

Severe Injury

A non-injured staff person should accompany and assist the injured employee with the following procedures:

- Go directly to an emergency room or call an ambulance.
- Assisting staff person should first obtain First Report forms from the Human Resources Department.
- Assisting staff person must stay in contact with the employee and supervisor through treatment.
- Assisting staff person must contact the Human Resources Department (and on-call supervisor if applicable) and inform them of the situation.
- When possible, the injured employee should follow the above procedure for communicating with the supervisor and the Human Resources Department.
- When it is not possible for the injured employee to return, the assisting staff person and the injured employee's supervisor must ensure that the Human Resources Department receives the completed First Report form within 48 hours of the injury.

Non-life-threatening injuries

- Provide initial first aid and complete First Report forms from Human Resources, available in the binder at each house and in the Human Resources Department.
- Arrange further treatment if needed
- Regular Business Hours: Contact the Human Resources Department.
- Overnight, Weekends or Holidays:
 1. Inform the on-call supervisor,
 2. If recommended by the on-call supervisor, call an emergency department or an urgent care center for advice on further treatment,
 3. If immediate treatment is recommended, go to a walk-in clinic, emergency room or urgent care center. Bring the First Report form with you. Do not go to any other hospital. After seeing a doctor, have the doctor complete a treatment form. Do not leave the form with the doctor. Carry it away with you!
 4. If immediate treatment is not required, contact the Human Resources Department no later than the following business day.

Communications and Timing

- Immediately (or within 4 hours): Injured employee must inform supervisor of status, return to work instructions and any restrictions.
- Within 24 hours: The Injury Report form must be reviewed and completed by the injured employee and supervisor.
- No more than 48 hours after injury: the completed Injury Report form must be returned to the Human Resources Department.

For further information, refer to the Workers' Compensation binder kept in each residence, in the residential staff office or in the Human Resources Department in Concord.

Employee Morale, Health and Welfare Activities

The Guild has established this policy to recognize achievement and service, and to maintain staff morale, health and welfare. The Guild believes that these measures further our mission to provide quality supports to the individuals we serve. All employees are eligible for these activities. These procedures complement the employee benefit plans administered by The Guild. The activities are incurred as part of an established practice and custom for the improvement of working conditions, employer-employee relations, employee morale and employee performance. Employee morale, health and welfare activities may include the following:

- Organization publications
- Recreational activities
- Health/first aid
- Gift certificates for exceptional accomplishments
- Staff recognition awards
- Employee Assistance Program
- Flowers/fruit baskets to recognize important events in an employee's life (birth, serious illness or death of an employee or immediate relative)
- Holiday gifts

Care will be taken that all costs incurred under this policy will be reasonable, ordinary, allocable and necessary to the provision of program services and adequately supported through written documentation. Any income generated from any of the fees charged or monetary collections taken, if any, for employee functions, will be used to defray the operating costs of the employee, morale, health and welfare activities.

Employee Handbook Cross Reference

(March 26, 2020)

Chief Executive Officer	Amy Sousa
Chief Financial Officer	Ivette Rodriguez
Chief Operating Officer	Michael Clontz
Chief Education Officer	Annie Willis
Chief Program Officer	Maureen Costello-Shea
Director of Human Resources	Matthew Carmichael
Director of Health Services	Jennifer Boniface-Smith
Privacy and Compliance Officer	Michael Clontz
Human Rights Officer (Youth)	Kimberly Saad
Human Rights Officer (Adult)	Boris Fomo
Communications Coordinator	Alex Comeau
Director of Finance	Deanna Asselin
Benefits' Administrator	Anjani Aineni
AED Coordinator	Carl Moran
Payroll Coordinator	Jodi Mangini

