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Owner Hillary White
Nash: HR Wrkplc
Pol & Cmplnc Sr
Mgr
Area Human
Resources
Scopes Beckman
Research,
COH Chicago-
Atlanta-
Phoenix,
Foundation
+ 3 more

Anti-Harassment, Anti-Discrimination and Retaliation

I. PURPOSE / BACKGROUND

City of Hope (COH), is committed to maintaining a work environment free from harassment, discrimination, abusive conduct, retaliation against employees, applicants for employment, individuals providing services in the workplace pursuant to a contract, unpaid interns and volunteers¹. This includes harassment and discrimination based on sex, gender, pregnancy, perceived pregnancy, childbirth, lactation, pregnancy-related medical conditions, gender identity and gender expression (including transgender individuals who are transitioning, have transitioned, or are perceived to be transitioning to the gender with which they identify), as well as harassment and discrimination based on such factors as race (including traits associated with race, such as hair texture and protective hairstyles), color, religious creed (including religious dress and religious grooming), national origin, citizenship, ancestry, age, physical disability (including HIV/AIDS), mental disability, medical condition, genetic information, legally protected family care or medical leave status, marital status, sexual orientation, domestic partner status, military status, veteran status, military caregiver status, Civil Air Patrol status, an individual's reproductive health decisions or any other basis protected by federal, state or local laws (collectively referred to as "Protected Characteristics"). COH also prohibits discrimination and harassment on the basis of any combination of Protected Characteristics and on the basis of any perception that a person has or is associated with someone who has one or more Protected Characteristics.

This policy sets forth COH's commitment regarding harassment, discrimination, abusive conduct and

retaliation; explains the mechanisms for reporting harassment, discrimination, abusive conduct and/or retaliation by those who feel they have or may have experienced such conduct; and describes the potential consequences of any prohibited harassment, discrimination, abusive conduct, and/or retaliation.

This policy applies to all persons involved in our operations, including coworkers, supervisors, managers, temporary or seasonal workers, agents, clients, vendors, customers, contractors, consultants, visitors, or any other third party interacting with COH ("third parties") and prohibits harassing conduct (as defined in this policy) by any employee or third party of COH including nonsupervisory employees, supervisors, and managers. If such harassment occurs on COH premises or is directed toward an employee or a third party interacting with COH, it should be reported as outlined in the policy.

II. POLICY

A. Harassment

1. COH strictly prohibits any conduct that constitutes harassment (sexual or other types), discrimination, abusive conduct, or retaliation against employees, applicants for employment, individuals providing services in the workplace pursuant to a contract, unpaid interns or volunteers based on any Protected Characteristic(s). COH also prohibits discrimination and harassment on the basis of any combination of Protected Characteristics and on the basis of any perception that a person has or is associated with someone who has one or more Protected Characteristics.
2. Sexual Harassment Defined - Sexual harassment includes unwanted sexual advances, requests for sexual favors or visual, verbal or physical conduct of a sexual nature when:
 - Submission to such conduct is made a term or condition of employment; or
 - Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
 - Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment.
3. Sexual harassment also includes various forms of offensive behavior based on sex and includes gender-based harassment of a person of the same sex as the harasser. The following is a partial list:
 - Unwanted sexual advances.
 - Offering employment benefits in exchange for sexual favors.
 - Making or threatening reprisals after a negative response to sexual advances.
 - Subtle or direct threats that a sexual or personal relationship is required for employment, promotion, or other favorable treatment in the workplace.
 - Visual conduct: leering; making sexual gestures; displaying sexually

suggestive objects or pictures, cartoons, posters, websites, emails or text messages.

- Verbal conduct: making or using derogatory comments, epithets, slurs, sexually explicit jokes, or comments about an employee's body or dress.
- Verbal sexual advances or propositions.
- Verbal abuse of a sexual nature; graphic verbal commentary about an individual's body; sexually degrading words to describe an individual; suggestive or obscene letters, notes or invitations.
- Physical conduct: touching, assault, impeding or blocking movements.
- Retaliation for reporting harassment or threatening to report sexual harassment.

4. Other Types of Harassment: Harassment on the basis of any legally Protected Characteristic, as identified above, is prohibited. Prohibited harassment may include behavior similar to the illustrations above pertaining to sexual harassment. This includes conduct such as:

- Verbal conduct including threats, epithets, derogatory comments or slurs based on an individual's Protected Characteristic;
- Visual conduct, including derogatory posters, photographs, cartoons, memes, drawings or gestures based on Protected Characteristic(s); and
- Physical conduct, including assault, unwanted touching or blocking normal movement because of an individual's Protected Characteristic(s).

5. Abusive Conduct Prevention: It is expected that COH and persons in the workplace perform their jobs productively as assigned, and in a manner that meets all of management's expectations, during working times, and that they refrain from any malicious, patently offensive or abusive conduct including but not limited to conduct that a reasonable person would find offensive based on any of the protected characteristics described above. Examples of abusive conduct include repeated infliction of verbal abuse, such as the use of malicious, derogatory remarks, insults, and epithets, verbal or physical conduct that a reasonable person would find threatening, intimidating, or humiliating, or the intentional sabotage or undermining of a person's work performance.

6. Employees found to be in violation of this policy will face disciplinary action up to and including immediate termination of employment without prior progressive discipline. Medical Staff Members will be disciplined by the employer and/or by Medical Staff leadership in accordance with applicable rules and policies. Third parties who violate this policy will be appropriately addressed.

7. It is important to understand that even unintentional behavior may constitute prohibited harassment or discrimination. Therefore, any behavior that violates or is inconsistent with this Policy, regardless of intent, is unacceptable.

B. Reporting and Investigating Harassment, Discrimination and Retaliation:

1. COH is committed to taking all reasonable steps to prevent harassment,

discrimination, abusive conduct, and retaliation from occurring in the work environment. If you feel that you have experienced or witnessed harassment, discrimination, abusive conduct, or retaliation, whether by one of your co-employees, a client or vendor, a member of management, or any third party doing business with COH, you should promptly report the incident to your supervisor or the Employee Labor Relations VP of Human Resources. You may also report any issues and concerns on a completely confidential basis by completing a TIPS form or by contacting Corporate Compliance (Compliance Hotline (877-264-2648) or go to <https://cohcompliancereport.com>). If an employee alleges that their supervisor or any another manager has engaged in harassing conduct or conduct that is otherwise believed to violate this policy, the employee must report the alleged conduct to Human Resources – reporting directly to the offending supervisor directly is not sufficient. Employees are not required to make a complaint directly to their immediate supervisor or to any supervisor or manager who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom the employee is uncomfortable discussing such matters for any reason.

2. Any supervisor who receives a complaint, or otherwise witnesses or learns, of harassment, discrimination, abusive conduct, retaliation, or any other misconduct through any channel, must immediately inform the Employee Labor Relations VP of Human Resources, and COH will attempt to resolve the matter internally. If the alleged conduct involves a COH Medical Staff Member, Human Resources must inform the COH Medical Staff President as well as the Member's employer.
3. When COH receives a report of misconduct or otherwise learns of any potential violation of this policy, COH will conduct a fair, timely, thorough, and objective investigation that provides all parties appropriate due process and reaches reasonable conclusions based on the evidence collected. COH may, in its discretion, refer complaints to a third party for investigation. Complaints and investigations will be kept confidential to the extent possible and to the extent permitted under applicable federal and state law.
4. Upon completion of the investigation, COH will communicate its conclusion as soon as practical. If COH determines that this policy has been violated, remedial action will be taken, commensurate with the severity of the offense, up to and including termination of employment. Appropriate action will also be taken to deter any such conduct in the future.
5. The federal Equal Employment Opportunity Commission (EEOC) and the California Civil Rights Department (CRD) will accept and investigate charges of unlawful discrimination or harassment at no charge to the complaining party. Information may be located by visiting the agency website at www.eeoc.gov or <https://calcivilrights.ca.gov>. The CRD Sexual Harassment Prevention Training may be accessed here: <https://calcivilrights.ca.gov/shpt>.

C. Potential Remedies and Solutions:

1. The response to the issues and conclusions raised through COH's reporting and investigation procedures detailed above will depend upon the facts revealed and the conclusions reached. In each case, COH will consider the available information, the

circumstances, the interests of COH and those involved, and other relevant factors in determining the appropriate response to the situation.

2. If it is determined that prohibited harassment, discrimination, abusive conduct, or retaliation has occurred, COH will take appropriate corrective action, which may include disciplinary action up to and including termination of employment. Any such action will be kept confidential to the extent possible. Medical Staff Members will be disciplined by the employer and/or by Medical Staff leadership in accordance with their respective rules and policies. Additionally, appropriate action will be taken to remedy the injury, if any, to the individual subjected to the harassment, discrimination, abusive conduct, or retaliation.

D. Retaliation Against Complainants/Participants Prohibited:

1. COH prohibits retaliation against any person by another employee or by COH for making a complaint, preventing unlawful or prohibited practices, participating in an investigation, or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a government agency. Prohibited actions of retaliation include, but is not limited to, termination, demotion, suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit. Any such acts of retaliation should be reported immediately.
2. Notwithstanding the above, anyone who knowingly makes a false claim or knowingly provides false information in the course of an investigation will be subject to disciplinary action up to and including immediate termination of employment without prior progressive discipline.

References

1. Illinois and Chicago Requirements

- a. COH complies with Illinois law and maintains a strict policy prohibiting sexual and other harassment and discrimination against Employees or applicants for employment based on race (including traits associated with race, such as hair texture and protective hairstyles (e.g., braids, locks and twists)), color, religion, sex ,pregnancy (including childbirth or medical or common conditions related to pregnancy or childbirth, past pregnancy condition and the potential or intention to become pregnant), national origin, ancestry, age (40 or over), marital status, reproductive health decisions, family responsibilities, protective order status, physical or mental disability, military status, sexual orientation (actual or perceived), gender identity, unfavorable discharge from military service, or citizenship status.
- b. Any employee who is found to have engaged in discriminatory or harassing conduct will be subject to appropriate disciplinary action, up to and including termination. Retaliation against anyone reporting acts of harassment or discrimination, participating in an investigation, or helping others exercise their right to complain about discrimination is unlawful and will not be tolerated.
- c. Any employee who believes that they been harassed or discriminated against may

file a complaint with the Illinois Department of Human Rights (IDHR).

d. The IDHR may be reached at the following locations:

Chicago Office: 555 West Monroe Street, Suite 700, Chicago, Illinois 60601, telephone number (312) 814-6200, (866) 740-3953 (TTY), fax number (312) 814-6251.

Springfield Office: 524 S. 2nd Street, Suite 300, Springfield, Illinois 62701, telephone number (217) 785-5100, (866) 740-3953 (TTY), fax number (217) 785-5106.

Website: www.illinois.gov/dhr. Email: IDHR.Intake@illinois.gov.

Employees may also report their concerns to the IDHR's Illinois Sexual Harassment and Discrimination Helpline at (877) 236-7703.

e. Additional Information for City of Chicago Employees: Sexual harassment is illegal in Chicago, in addition to being unlawful under state and federal laws. COH complies with Chicago law and maintains a strict policy prohibiting sexual harassment and unlawful discrimination against employees or applicants for employment based on their actual or perceived parental status or lawful source of income, in addition to the anti-discrimination protections set forth above. Under the Municipal Code of Chicago, "sexual harassment" is defined as any:

- Unwelcome sexual advances or unwelcome conduct of a sexual nature; or
- Sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position; or
- Requests for sexual favors or conduct of a sexual nature when:
 - Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
 - Submission to or rejection of such conduct by an individual is used as the basis for any employment decision affecting the individual; or
 - Such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.
- All Chicago employees are required to participate in sexual harassment prevention training and bystander training on an annual basis.
- Retaliation against anyone reporting acts of harassment or discrimination, participating in an investigation, or helping others exercise their right to complain about discrimination or harassment is unlawful under Chicago laws and will not be tolerated.
- In addition to the complaint procedures set forth above, any employee who believes they have been harassed or discriminated against may file a complaint with the Chicago Commission on Human Relations (CCHR).
- The CCHR's office is located at 740 N. Sedgwick, 4th floor, Chicago, IL 60654, telephone number (312) 744-4111, (312) 744-1088 (TTY), fax number (312) 744-1081. The CCHR website is <https://www.chicago.gov/>

Related Policies

1. COH - Southern California (So Cal)
 - a. Disciplinary Action
 - b. Disruptive Behavior
 - c. Event Identification and Tracking System (TIPS) *
 - d. Grievance and Dispute Resolution
 - e. Patient Complaints and Grievances
 - f. Sentinel, Never and Adverse Event Evaluation, Reporting and Disclosure
 - g. Vendor Relations/Sales Representatives
2. TGen
 - a. Whistleblower
 - b. Ethics and Conduct
3. COH - So Cal, City of Hope Chicago-Atlanta-Phoenix (CAP) TGen
 - a. General Expectations of Employment

Related Form

1. TIPS – Tracking Information for Patient Safety Form (ACCESS ONLINE TIPS REPORTING) *

Medical Staff Related Policies, Bylaws, and Rules/Regulations

1. Medical Staff Bylaws
 1. Section 3.8, "Harassment Prohibited"
Article 8, "Corrective Action"
2. Medical Staff Rules and Regulations
 1. Section 25.0, "Professional Code of Conduct and Ethical Obligations"
3. Professional Conduct: Behavior Standards Policy
4. Professional Conduct: Clinical Expectations Policy

Appendix One: Acronyms, Terms, and Definitions Applicable to this Policy

1. **City of Hope (COH):** City of Hope National Medical Center, City of Hope Medical Foundation, City of Hope Chicago-Atlanta-Phoenix, Beckman Research Institute, Philanthropy, and TGen, collectively referred to as City of Hope (COH) for the purposes of this policy.

2. **Employee:** An individual who is compensated via COH's payroll system in any capacity of employment status (note: this would cover per diem, temps, part-time) and whose work status is established and fully governed by COH.
3. **Medical Center:** Refers to all facilities owned and operated by City of Hope National Medical Center (including all facilities on Helford hospital's license and City of Hope OC Hospital).
4. **Medical Staff Member:** Any practitioner (including physicians and psychologists) who is currently appointed to the COH Medical Staff.

Approval Signatures

Step Description	Approver	Date
Leadership Approval	Lani Suzuki: Policy and Procedures Manager	4/10/2025
Policy Owner	Hillary White Nash: HR Wrkplc Pol & Cmplnc Sr Mgr	4/7/2025

Scopes

Beckman Research, COH Chicago-Atlanta-Phoenix, Foundation, Medical Center, Philanthropy, TGen