

**LUTHERAN CAMPING CORPORATION OF CENTRAL PENNSYLVANIA
HARASSMENT FREE ENVIRONMENT POLICY**

I. POLICY

It is the policy of the Lutheran Camping Corporation of Central Pennsylvania (“LCC”) to maintain a working environment where everyone is treated with respect and dignity. All workplace relationships should be professional and free of harassment, unlawful bias and other offensive conduct. The LCC will not tolerate unlawful discrimination, including harassment, based on sex, race, religion, national origin, disability, gender identity, gender expression, sexual orientation, and other forms of legally impermissible harassment. The LCC also will not tolerate offensive or otherwise unprofessional behavior which it determines is inappropriate in the workplace, even if it does not amount to unlawful harassment. The LCC’s policy prohibits harassing conduct even if it is not sufficiently severe or pervasive to meet the legal definition of a hostile environment.

II. SCOPE

All employees, applicants for employment, visitors and campers at all locations are protected by this policy. This policy prohibits harassment not only by or toward employees, but also by or toward campers, parents, visitors, and other non-employees on the LCC’s premises or conducting business with the LCC.

III. DEFINITIONS

A. Harassing Conduct (General)

Verbal, physical or visual conduct that relates to race, color, gender, national origin, age, disability, religion, any other protected classification, or any other conduct which has the purpose or effect of interfering with work performance or creating an intimidating, hostile or offensive working environment.

Examples include but are not limited to (i) epithets, slurs, or threatening, intimidating, or hostile acts that relate to race, color, gender, national origin, age, disability, religion, any other protected classification or any other conduct; (ii) written or graphic material on the Employer’s premises or on Employer business that reflects hostility or aversion toward an individual or group because of race, color, gender, national origin, age, disability, religion, any other protected classification, or any other reason.

B. Sexually Harassing Conduct

Unwelcome touching, sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature when such conduct:

1. Is made explicitly or implicitly a term or condition of employment, or

2. Is used as a basis for employment decisions, or
3. Has the purpose or effect of interfering with work performance or creating an otherwise intimidating, hostile or offensive working environment.

Examples of behaviors that would violate this policy include but are not limited to:

- Repeated flirtations;
- Sexual advances or propositions;
- Pressure for sexual favors;
- Jokes, stories, comments, or verbal abuse of a sexual nature;
- Offensive or degrading or derogatory words used to describe or refer to a person;
- Leering, whistling or other sexually suggestive conduct;
- The display in the workplace or while on Employer business of sexually explicit or suggestive objects;
- Inquiries into or descriptions of one's sexual experiences or activities;
- Unnecessary physical contact.

The LCC expressly prohibits any employee from explicitly or implicitly linking any term or condition of employment to sexual or romantic conduct, even if the conduct is consensual.

IV. COMPLAINT AND INVESTIGATION PROCESS

Any employee or applicant who feels s/he is a victim of – or is otherwise aware of – a violation of this policy by any employee should promptly inform the camp director or assistant camp director. Any employee who is advised or aware of a possible violation of this policy must contact the camp director or assistant camp director.

The camp director will be responsible for handling and investigating all complaints, except for those made by or against members of the camp director. In the case of a complaint against a camp director, the Executive Director of the LCC shall assume such investigative responsibility. If that is inappropriate for the situation, the President of the Board of Directors for the LCC shall designate a person to conduct the investigation.

Each situation will be promptly investigated. The LCC will maintain confidentiality in the investigation process as much as reasonably possible, consistent with its obligation to investigate and respond to the complaint. The LCC in its discretion may take reasonably necessary or prudent interim measures pending the outcome of the investigation.

V. CORRECTIVE ACTION

The LCC will take corrective action when it has reason to believe there has been a violation of this policy. The LCC will take reasonably appropriate disciplinary and/or remedial measures, up to and including discharge, based on the totality of the circumstances.

VI. NO RETALIATION

No individual who reports or complains about harassment or improper conduct, or who assists the LCC in an investigation of harassment, will be subjected to retaliation. If you have witnessed or experienced behavior you believe to be retaliation, or if you are aware of such behavior, you have a responsibility to report the behavior immediately to a camp director or assistant camp director.

The LCC will not tolerate any effort to avoid, hinder or corrupt the complaint or investigation process, including refusal to cooperate with an investigation or knowingly making false statements to the person responsible for the investigation during the complaint or investigation process. Such actions may result in employment action up to and including termination of employment.