



EMPLOYEE HANDBOOK

APPROVED AUGUST 2021

OVERSEEN BY:
EXECUTIVE DIRECTOR & EMPLOYEE RELATIONS

FIRST STEP
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First Step’s Employee Handbook

1.0 GENERAL EMPLOYMENT POLICIES

1.1 WELCOME NEW EMPLOYEES

It is a pleasure to welcome you as a new member of the First Step family!

This handbook has been developed to introduce staff to our agency's policies and procedures that will affect the relationship between you, First Step, and fellow employees and assist you during your employment with First Step. It includes formal personnel policies which have been approved by the First Step Executive Director (ED) and Board of Directors. A brief benefits description is also included to acquaint you with the benefits available to you as a First Step employee.

This handbook replaces and supersedes all prior employee manuals, handbooks, and statements of policy. First Step retains the right and power in its discretion to amend, modify, and discontinue the personnel policies and procedures in this handbook for any reason or at any time.

The Director of Employee Relations (also noted as ‘Employee Relations’ throughout the handbook), or your supervisor, will be able to answer any questions that you have and assist in understanding these policies, procedures, and benefits. However, your supervisor is not authorized to modify them. All modifications need to be in writing, approved, and signed by the ED of First Step.

After reviewing the entire manual, return the acknowledgement sheet confirming that the Employee Handbook has been received and reviewed. We must receive your completed acknowledgment sheet within 10 business days of hire.

1.2 ORGANIZATIONAL STRUCTURE

The ED, with Board of Directors (also noted as ‘Board’ throughout the handbook) and legal advice, is responsible for establishing employee policies and procedures. The Board is also responsible for hiring the ED. The responsibilities of the ED include, but are not limited to, managing the staff and the day-to-day administration of the agency. The ED is responsible for all communication with the Board.

First Step has seven Core Values. They are:

Safety	Our commitment to safety is paramount.
Empowerment-Based Advocacy	We advocate with a holistic approach which is client-driven.
Social Justice	We demand fairness and equality for all.
Value Resources	We are conscientious stewards of our resources.
Community Action	We engage in strategic partnerships to maximize the impact of our work.
Integrity	We adhere to a high ethical standard while doing our work with honesty and professionalism.
Anti-Racism.	We demand an end to oppression and take responsibility for dismantling racism within our sphere of influence.

Failure to uphold these values is a policy violation that will result in disciplinary action, up to and including termination.

I.3 EMPLOYMENT TERMS

Your employment with First Step is at-will. This means that you have the right to terminate your employment with First Step at any time, with or without notice or cause. This also means that First Step may terminate your employment at any time, with or without notice or cause. There is no information contained in this handbook that affects or modifies at-will employment.

I.4 EMPLOYMENT STATUS

Employment relationships is terminable at-will with or without cause and with or without notice, at any time during the employment relationship. The following are the employee categories as established by First Step:

Orientation Status:	Temporary:	Part-Time:	Full-Time:
<ul style="list-style-type: none">•All new employees will be on an orientation status during the first ninety (90) days of employment. The presence of an orientation term is not to be construed as creating an employment contract between any employee and First Step until the orientation term is completed.	<ul style="list-style-type: none">•Temporary employees are those who are employed for a specific period of time or on an occasional basis that is less than six (6) months. Temporary employees are not eligible for any benefits.	<ul style="list-style-type: none">•Part-time employees are those employees who do not work more than thirty-five (35) hours per week. Part-time employees are eligible for retirement benefits only and specific earned sick time.	<ul style="list-style-type: none">•Full-time employees are those employees who work at least thirty-seven and one half (37.5) hours per week continuously. To achieve full-time status, an employee must work at least 37.5 hours per week for a continuous ninety (90) day period.

I.5 EMPLOYEE CHANGE OF STATUS

Employees must report any changes in status listed below within 10 days to Employee Relations via Employee Web Service (EWS):

- Name
- Address
- Marital status/name change

Any changes in status listed below must be report to Employee Relations via the Employee Status Change Form within 10 days of change:

- Medicare Eligibility
- Medicaid Eligibility

When either the employee or the employee's spouse (if currently covered under First Step's health care plan) becomes eligible for Medicare or Medicaid, they are required to report this information to the Employee Relations for proper coordination of existing First Step benefits along with Medicare and/or Medicaid. Failure to report will result in disciplinary action, up to and including termination.

I.6 CONFLICT OF INTEREST

As an employee, you are expected to act in the best interest of First Step, and to exercise sound judgment which is unclouded by personal interest. While performing your duties at First Step, and in any other outside activities, you should strive to avoid the appearance, as well as the reality, of a conflict of interest.

A conflict of interest exists if your circumstances would lead a reasonable person to question whether your motivations are aligned with First Step's best interests. For example, if you are involved in an outside activity or have a financial or other personal interest that may interfere with performing your responsibilities at First Step, you may have a conflict of interest.

To avoid a conflict of interest or the appearance of a conflict of interest, First Step employees are prohibited from accepting personal gifts or gratuities from vendors, suppliers, clients, potential employees, potential vendors or suppliers, or any other individual or organization, under any circumstances.

We believe the acceptance of such gifts, along with being unprofessional, may place our Board and employees in compromising positions that are not in the best interest of First Step or its employees.

In the case of a material gift being given from a client, if your best judgement believes declining a gift could be triggering or overly upsetting, you may accept the gift while reminding the client of our policy and that First Step does not encourage compensation. If a gift is personalized for the staff, accepting the gift is understood, but again, a reminder for the client should be given to discourage the client from bringing more gifts.

At no time should staff intentionally accept a monetary gift other than donations to the agency (including gift cards, money, checks, etc.).

Any gifts that are accepted must be made known to your direct supervisor.

In addition, due to possible conflict of interest, it is the agency's policy that when related persons work for First Step, no employee may work under the direct supervision of any immediate family member or cohabitating partner.

I.6.1 OUTSIDE EMPLOYMENT

Any outside job held by an employee of First Step must be reported to Employee Relations to mitigate any Conflict of Interest. Outside employment cannot interfere with employee job performance of regular agency responsibilities or employee work schedule. Outside employment also may not jeopardize agency and client confidentiality. If a conflict should occur, the employee must inform Employee Relations and the ED.

I.7 EMPLOYEE RECORDS

Personnel records will be maintained for all full-time and part-time employees. Each employee's file is regarded as confidential information and only the Director of Employee Relations and ED, or designated representative of the ED, will have access to the file for maintenance purposes.

Each employee will have access to their personnel record upon the receipt of a written request to Employee Relations. The Director of Employee Relations, ED, or designee shall meet with the employee to review the file at the agreed time.

I.7.1 SOCIAL SECURITY NUMBER PRIVACY

First Step takes privacy seriously. To the extent possible, the agency intends to ensure the confidentiality of social security numbers.

First Step strictly prohibits the unlawful disclosure of social security numbers.

Access to information or documents that contain social security numbers is limited to those who have a right/need to know.

Prior to the disposal of any document, you must first inspect it to determine whether it contains social security numbers. If any document intended for disposal is found to contain social security numbers, you must dispose of the document properly. First Step has determined that shredding is the only currently acceptable method of disposing of documents containing social security numbers.

Any employee that violates this policy will be subject to discipline, up to and including termination.

I.8 EQUAL EMPLOYMENT OPPORTUNITY

First Step is committed to equal opportunity employment and creating a workforce that is inclusive and representative of the community we serve. We will not discriminate against employees or applicants for employment on any legally recognized basis including but not limited to race, age, color, religion, sex, sexual orientation, gender identity, gender expression, genetic information, marital status, national origin, citizenship, ancestry, physical or mental liability, veteran or disable status, Vietnam-era military status, political affiliations, height, weight, or any other factor not related to the needs of the job.

I.8.1 AMERICANS WITH DISABILITIES ACT

First Step is committed to providing equal employment opportunities to qualified individuals with disabilities, which includes providing accommodations whenever requested. In general, it is your responsibility to notify Employee Relations if there is a need for an accommodation. You may be asked for your input on the type of accommodation you believe may be necessary and/or the functional limitations caused by your disability as it relates to the essential functions of your job. Depending on the type of accommodation requested, we may need your permission to obtain additional information from your physician or other medical or rehabilitation professionals. First Step has made every effort to ensure the facilities are barrier free and accessible according to the appropriate federal and state statutes.

I.9 POLICY CHANGES/EMPLOYEE COMMUNICATIONS

It is the goal of the agency to foster open communication among all employees. All notices that affect employees will be communicated via agency email and shared on the agency's computer network and will include information on safety, policy changes, and any general notices.

2.0 SCHEDULE & COMPENSATION

2.1 PAY PERIODS

Employees are paid every other week (biweekly). The employee's electronic pay voucher will represent the total compensation for hours worked during the pay period, less the deductions required by law or as authorized by the employee. Our fourteen-day pay period begins at 12:00 am on Saturday and ends at 11:59 pm two weeks following on Friday.

If you find there is an error with your payroll check or your expense reimbursement, it is the responsibility of the employee to notify the Director of Employee Relations as soon as possible. As a matter of policy, advances on salary or wages are not given.

2.1.1 EMPLOYEE WEB SERVICES (EWS) TIME SHEET

All Employees are required to complete their own time sheets in the online system, EWS. Anyone filling in another person's time sheet, asking another person to fill in their time sheet, sharing their username and password to EWS, or in any way falsifying any time sheet, will be subject to discipline, up to and including termination of employment.

2.1.2 HOURS OF WORK

First Step employees are hired either on the basis of an hourly rate of pay for accrued hours worked, or on a salary basis.

FOR HOURLY EMPLOYEES: The standard work period is 75 hours within the 14-day pay period. The standard full-time work week is 37.5 hours per week within seven consecutive days. Variations in days and/or assignments will be determined by individual programs to assure the continued and uninterrupted operations of First Step.

FOR SALARIED EMPLOYEES: The standard full-time work week is 37.5 hours per week, 75 hours within the schedule of a 14-day pay period. Salary employees do not qualify for overtime and are expected to work a minimum of 75 hours per pay period, or whatever is necessary to complete their job responsibilities. Personal lunches are not covered work time and should not be included in work time tracking.

2.1.3 BREAK PERIODS

A paid 15-minute rest period may be taken during each four hours of work for rest and relaxation. Therefore, employees working an 8-hour shift are entitled to two 15-minute breaks per shift. Employees working a 4-hour shift are entitled to one 15-minute break during their shift. Breaks must be taken all at once for up to 15-minutes; it cannot be divided up into shorter breaks.

All employees are expected to take the breaks at times agreed on with their supervisors so as not to interfere with coverage and/or provision of services. Rest periods may not be used to offset late arrivals, early departures.

The unpaid lunch period varies from one half hour to one hour depending upon employee's working hours and the schedule arranged with their supervisor. Some lunch hours may be covered as worked time with supervisor approval, such as lunch meetings or trainings during

lunch hours. Shelter staff members, who are working alone, due to the nature of their position, are unable to step away for their unpaid lunch period will be paid in full for the entire duration of their shift. If your shift is less than six consecutive hours, the 30-minute unpaid lunch break is not required but can be taken, if chosen.

Interns should also adhere to this policy.

2.1.4 SMOKING BREAKS

Employees who smoke will have opportunities to do so during their 15-minute breaks and a 30-minute lunch break. Interns should also adhere to this policy.

LOCATION OF SMOKING BREAKS: Under no circumstances should employees, volunteers, or interns smoke past the “No smoking beyond this point” signs at the Wayne site. Please use the container provided to extinguish and dispose of cigarettes.

Employees, volunteers, and interns are also prohibited from smoking in the designated client smoking area in Wayne.

Ideally, smoking should only occur in your vehicle at any site. If you do not have a vehicle, please see your supervisor for an alternate location, which does not violate any part of this policy. Please note that smoking is not allowed in any agency vehicle.

First Step employees, interns, volunteers, clients, visitors, vendors, and independent contractors should not be subject to second-hand smoke upon entering a First Step site, so please plan accordingly. First Step staff, volunteers, and interns shall not smoke with or around clients whatsoever at any site.

2.2 PAYROLL DEDUCTIONS

In accordance with Federal, State, and Local requirements, First Step will deduct the required amount from gross earnings each pay period. Other deductions as required by court order or as voluntarily authorized by the employee may also be made. For example, voluntary deductions include sums designated for retirement plan, charitable contributions, or insurance.

For your convenience, withholding forms and forms authorizing deductions are available from Employee Relations.

2.3 BUSINESS EXPENSES & REIMBURSEMENT

Business related expenses can sometimes occur during employment. All business related expenses should be approved by a supervisor before completed. Options on how to pay are to be discussed, as gift cards, agency credit cards, or check requests may be more appropriate and/or available. An employee’s personal funds may be approved to be used and submitted for reimbursement.

It is the policy of First Step to provide reimbursement for employees on pre-approved travel related expenses, including transportation, parking, and meals. No cash advances will be made. Tipping up to 20% is reimbursable for ground transportation.

Travel mileage will be reimbursed for employees, using mileage for the most direct route for car travel. Those employees going early or staying late for vacation/personal business will not be reimbursed for the round trip. Expenses incurred for an agreed upon schedule in advance will be reimbursed by First

Step. More information on specific travel-related and business expense reimbursement is further outlined in this section.

2.3.1 EXPENSE SUMMARY FORM

Employees that incur authorized business expenses for First Step will be reimbursed. Business expense reimbursements will be made on the basis of submitting an Expense Summary Form to your supervisor by the third business day of the month following the incurred expense.

The expense summary must be accompanied by all appropriate original itemized receipts (receipt must detail items purchased) and approved by the supervisor authorizing the expense to be reimbursed. If a tip was made, the itemized receipt should include the exact amount provided and be signed by the employee. Authorized expenses not submitted on time, not documented, or accompanied by the appropriate receipts, will not be reimbursed. Copies of the original receipts submitted with Expense Summary Form should be kept by the employee.

2.3.2 SALES TAX CERTIFICATE OF EXEMPTION

Due to the agency's status as a 501(3)c under the Michigan Department of Treasury, all purchases made on behalf of the agency are exempt from Michigan sales tax. Therefore, employees should always present the most up-to-date State of Michigan Sales Tax Certificate of Exemption form when making an agency related purchase. This would be true for on-line purchases as well. Not all places will accept the form, such as some airlines, hotels, or online platforms. Nevertheless, First Step must be able to prove that an attempt was made in order to bill any sales tax to a grant. Therefore, when sending in receipts or invoices that include sales tax, employees are asked to indicate the refusal of acceptance.

2.3.3 AGENCY CREDIT CARDS

Agency credit cards are to only be used for agency related purchased. After making a purchase on an agency credit card, the employee will send copies of all signed receipts to the Finance Administrator as soon as possible. Originals should be kept and stored by the employee.

If paying a vendor for a service, we always need to first obtain a W9 in order to 1099 them, if necessary. If we are paying someone to come on-site, we need their liability insurance certificate and their W9. Again, First Step should always obtain these documents before giving them any payment information and our sales tax-exempt form.

2.3.4 NON-REIMBURSABLE ITEMS

When purchasing something not covered or pre-approved by First Step's policies, it is best practice to ask for the items to be on separate checks for easy and clear reimbursement. For example, if an alcoholic beverage is purchased on a trip, you should ask for it to be on a separate receipt.

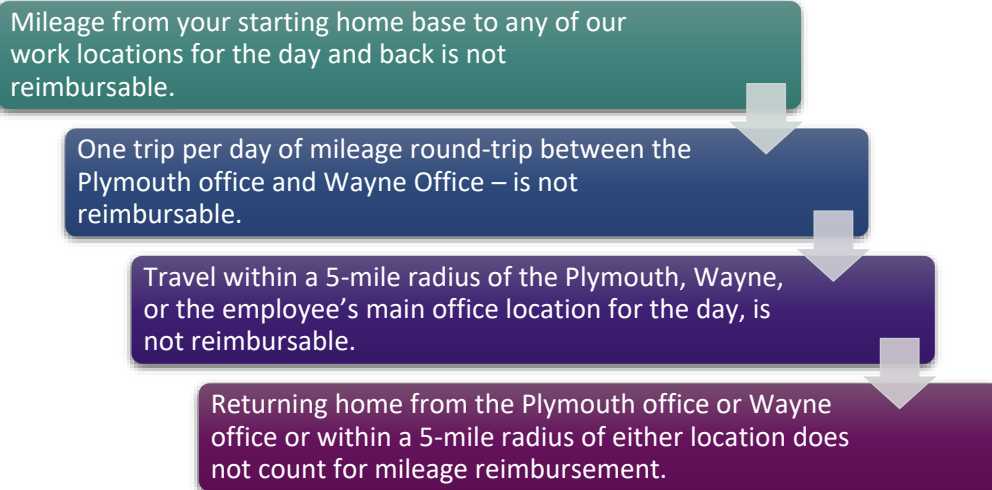
The following items will NOT be reimbursed by First Step:

- Alcoholic beverages
- Fines for parking or moving violations
- Lost or stolen property, including cash
- Personal expenses

- Companion expenses
- Excess baggage costs (more than one checked bag or overweight).
- Tips outside of normal situations in which a tip is expected (tips for taxi drivers, food servers, baggage handlers are permissible)
- Valet parking if other parking options are safe and available (unless there is a physical/medical reason for valet parking)
- Any other expense that was not pre-approved

2.3.5 MILEAGE

Mileage will be reimbursed if a personal vehicle is used, and the trip is **100% business-related**. Trips that are part business and part personal are not reimbursable. Carpooling and use of agency vehicles are encouraged. Mileage for work business, travel, meetings, and training will be reimbursed at the federal rate, following the criteria below:



Certain positions, such as those within the Community Response program, may have program specific mileage policies, to be approved by Executive Director and Employee Relations. See program specific policies for further information.

2.3.6 MEAL & LODGING

Meal and lodging allowances will be determined in accordance with the location, under federal guidelines. The acceptable rates for meals (rate includes tip), etc. based on the location will be given to the employee before departure. For location specific information, see <http://www.gsa.gov/portal/category/104711>. Please note that incidental expenses/tipping vary from location to location and are noted at the above website.

2.3.7 AIR & TRAIN TRAVEL

First Step will make the lodging arrangements and payments so that the rates are within federal guidelines. Air or train travel will be booked by First Step as much in advance as possible to secure the most reasonable rates. Air or train travel will be in coach seating and reflect the best price available. Times spent traveling by air will also be reimbursed (including two hours prior to

flight). One checked bag per flight will be reimbursable. An employee who prefers an itinerary that cost more than the rate secured by First Step, will need to pay the difference.

2.3.8 PERSONAL BUSINESS

In the case in which vacation time/personal business is added to a business trip, employees will not be paid for hours, mileage, meals, or lodging associated with vacation or personal business time. For example, if an employee travels to a conference on a Tuesday afternoon, which ends on a Thursday afternoon and decides to extend the trip until Sunday, mileage will only be paid for the mileage to the conference. First Step will also not reimburse employees for any meals, hours, or lodging associated with the vacation or personal business.

If an employee brings a non-employee on business, First Step will not be responsible for any additional costs or liability associated with the non-employee. For example, if an employee brings a partner/spouse on a business trip which prevents the employee from carpooling with other employees going on the same trip, mileage may not be paid. In addition, it is expected that the employee will participate in 100% of business-related meetings, workshops, conferences, etc. while out of town on business.

2.4 WORKING FROM HOME

From time to time, working from home may be possible depending on your positions, job duties, and supervisor approval. Working from home shifts must be pre-scheduled with your supervisor. All confidentiality policies must be followed inside and outside the agency.

The following positions do not qualify for working from home:

- Residential and Hotline Staff
- Front Desk Administrators
- Maintenance
- Janitorial
- Nurturers
- Any position designated by the Executive Director, Employee Relations, or a supervisor as a must be on-site position.

2.5 EMPLOYEE AVAILABILITY & BOUNDARIES

Employees are required to set workday hours and establish strict boundaries to only work during these hours when possible.

Employees who are issued agency provided cell phones or laptops are not expected to be available outside of their set working hours to clients, First Step colleagues, community partners, and/or other general agency related callers/contacts. This includes through/by email, phone, text messaging, and other forms of communication.

Employees should regularly communicate with clients, community partners, and colleagues around when they are available/reachable, so that they will have clear expectations around when they can expect to receive a response to a text, email, or voice messages that may come in before or after work hours.

Agency provided devices, such as laptops and cell phones, should only be turned on at the beginning of the employee's workday and turned off after work hours.

2.6 ABSENTEEISM & LATENESS

Punctuality and regular attendance are essential to the proper functioning of the agency. Employees are expected to report for work on time, on a regular basis. Unnecessary absenteeism and lateness is expensive, disruptive, and places an unfair burden on our clients and other employees. Unsatisfactory attendance or excessive tardiness will result in disciplinary action, up to and including termination.

If an employee is going to be late or absent for any reason, the employee must notify their immediate supervisor as far in advance of the starting time as possible. It is the responsibility of that employee to ensure that proper notification is given. Any employee who fails to give such notification will be subject to disciplinary action, up to and including termination.

If an employee is absent for three consecutive shifts without notifying First Step, or otherwise accumulates three unexcused absences in any six-week period, that employee will be considered to have abandoned their employment unless First Step determines there was an adequate justification for the lack of notice. If notice is given and First Step determines in its sole discretion that the absence or tardiness is not justified, it will be considered an unexcused absence.

SNOW & EXTREME WEATHER: If employees are unable to get to work due to snow, or other extreme weather conditions, and First Step has not designated a snow or extreme weather day, employees will not be paid. Full-time employees may use sick/personal time, vacation time, or floating holiday, if approved by their supervisor.

2.7 TERMINATIONS

First Step is an at-will employer. When an employee voluntarily terminates their employment at First Step, two weeks prior notice is encouraged.

Upon termination, an employee shall be paid only through the last day worked.

Any employee who has terminated employment with First Step shall be entitled, upon request by that employee, to an exit interview with the ED.

3.0 BENEFITS & LEAVE

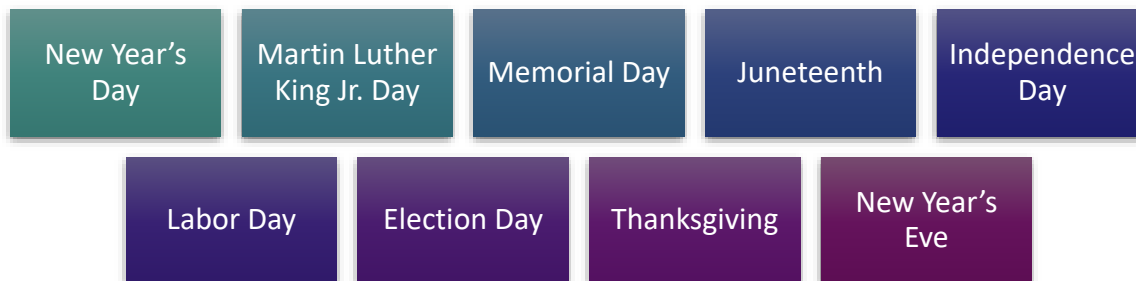
3.1 MEDICAL/DENTAL/VISION/LONG TERM DISABILITY/LIFE INSURANCE/401K

First Step is proud to offer a broad range of benefits to promote the health and wellbeing of its employees. Medical/Dental/Vision/Prescription Drug Coverage, Long Term Disability, and Life Insurance is available for all full-time employees. Part-time employees working at least 30 hours per week, are eligible for Medical/Dental/Vision/Prescription Drug Coverage benefits. Also, an Employee Assistance Program (EAP) is available for all employees. A 401K with an agency 3% salary/hours pay rate match (this is in addition to base pay) is also included for all employees.

- **Eligibility and Participation:** All active, full-time employees working at least 37.5 hours per week, are eligible for Medical, Dental, and Vision coverage beginning on the 1st of the Month after 60 days of full-time employment. Spouses and dependent children may be added to the plan at the expense of the employee. If the employee declines coverage, a waiver form must be completed.
- **Enrollment:** All full-time employees are eligible for Long Term Disability and Life Insurance enrollment on the 1st of the month after 60 days of full-time employment.
- **Benefits Provided:** Employees should review benefit information online for further information on the coverage and a complete explanation of our benefits.
- **Termination:** Health/Dental/Vision benefits provided by First Step will expire at the end of the month in which termination occurs, except as described herein, or as otherwise prohibited by law. Life and Long-Term Disability Insurance benefits provided by First Step will expire on the date of termination.
- **COBRA:** First Step provides eligible employees with a written description of their COBRA rights when the employee becomes eligible for coverage under the Health Insurance plan. The employee pays the full cost of COBRA as described by the health plan, plus an administration fee.

3.2 AGENCY CLOSURE DAYS

All full-time employees are eligible for agency closure day paid benefits for the following days:



A full day of holiday pay is = 7.5 hours

To be paid for an agency closure day the employee must have worked the scheduled workday preceding the closure day and the first scheduled workday following the closure day, unless approved by their supervisor.

If the closure day falls on a weekend, the ED will designate either the previous Friday or the following Monday as the closure day.

3.3 LOW AVAILABILITY DAYS & ESSENTIAL SERVICES

First Step has services that run 24-hours a day 7-days a week regardless of closure days. Due to this, there is sometimes low-availability days in which these services are difficult to staff. The agency will pay any hourly full-time or part-time shifts worked on an agency-designated low availability day at time and a half pay. Time and a half pay is **ONLY** for shifts that provide coverage to 24/7 essential services and not for shifts worked on low-availability days elsewhere in the agency.

Low Availability Days May Include:

- All observed agency closure days
- Day after Thanksgiving
- Christmas Eve
- Christmas day
- Any day declared by the Executive Director as a low availability day

3.4 FLOATING HOLIDAYS

To honor personal, cultural, and religious observances, First Step provides four (4) Floating Holidays each year. Only four floating holidays are allowed within 12 months of the employee's anniversary date; it cannot be carried over into the next 12-month period. Each Floating Holiday equals 7.5-hours. These days are the employee's choice but must be taken as one full 7.5-hour day and must be approved by your supervisor. Floating Holidays will be deposited into an employee's leave bank after 90 days of employment and renewed on each employee's anniversary date.

3.5 PAID TIME OFF USAGE

In an effort to create a process that allows employees to have more empowerment in their personal time planning during their work year, to manage agency liability, and to mandate staff self-care, the following policies are in place. *These policies apply to full-time staff only.*

3.5.1 PAID TIME OFF (PTO)

PTO Summary for ALL Full-Time Employees	
Length of Service	Amount of Vacation
0 up to 3 years	2 weeks per year = 75 hours
3 years up to 5 years	3 weeks per year = 112.5 hours
5 years up to 10 years	4 weeks per year = 150 hours
10 years up to 20 years	5 weeks per year = 187.5 hours
20 years +	6 weeks per year = 225 hours

On the employee's anniversary, any unused Paid Time Off (PTO) from the previous year will be forfeited and is not eligible for carry over. Any unused vacation time holds no value at the end of the employee's anniversary year and will not be paid out. Any hours remaining in an employee's PTO bank will be removed and their PTO bank will be loaded with the hours for their next work year based on the chart above. PTO is paid at the employee's regular hourly rate, regardless of what their pay would be if they worked the hours.

For new employees, PTO shall be deposited into their PTO bank after the completion of 90 days of employment. Termination prior to the completion of 90 days of employment results in zero PTO time available.

At the time of separation, any unused PTO time holds no value and will not be paid out upon leaving the agency.

PTO hours may be taken in increments of .25 hour (15 minutes) and used at any time during the calendar year with supervisors' approval. PTO time can be requested up to 90 days in advance of the leave request date. All PTO time must be approved by your supervisor in order to maintain the proper functioning of First Step at all times.

If an employee changes status from full-time to part-time, full-time benefits are forfeited. If the employee returns to full-time, they will start over at day one of full-time employment status.

Temporary short-term, part-time agreements may be discussed with the Executive Director and Employee Relations for short-term consideration and maintenance of benefits.

3.5.2 FLEX TIME (FT)

To alleviate the hardships caused by illness and family/personal needs, First Step provides paid Flex Time (FT) benefits to all employees.

After completion of 90 days of continuous paid employment, a full-time employee will have accumulated three FT days and will continue to accumulate one FT day per month (1 day per month = 12 days per year.) **One day = 7.5 hours.** Sick/Personal hours may be taken in increments of .25 hour (15 minutes) and used at any time during the calendar year with supervisors' approval.

After completion of 90 days of continuous paid employment, part-time employees who qualify under the Michigan Paid Sick Leave Act, will earn one hour of FT for every 35 hours worked up to 40 hours.

For full-time employees, FT days may be accrued and rolled over from year to year, up to a maximum of 60 days = 450 hours. Once a full-time employee reaches 450 hours of FT, they will no longer earn any FT leave until their balance drops below 450 hours. Once the balance is below 450, the accruals will resume, but the amount of the accrual may vary if earning 3.75 hours bi-weekly would take their personal/sick bank over 450 hours. This also applies the same to part-time employees when they reach 40 hours in their bank. Part-time employees may roll up to 40 hours over per year, up to a maximum of 40 hours in their FT bank.

Any earned unused sick/personal time will be forfeited at the time of separation and holds no value and will not be paid out.

Under the following circumstances, Flex Time days will not be paid:

1. Sickness or an injury that is compensated under Worker's Compensation or other disability programs.

To be eligible for FT benefits, the following conditions are necessary:

1. Employees must notify their supervisor as early as possible in advance of their scheduled time to report to work, and the expected time they will be able to return to work.
2. Any absences from work due to illness or injury may require documentation by the employee's attending physician, such as a release to return to work.

3.6 LEAVE OF ABSENCE

Under special circumstances, full-time and part-time employees with one year of continuous employment may be granted an unpaid personal leave of absence for up to six weeks per year.

Should you need to request a leave of absence, submit your request in writing outlining the necessary reasons for the leave to the ED. The decision to grant a personal leave of absence is dependent on written approval from the ED and will not be granted without your written request.

Requests to extend the personal leave will be made at the discretion of the ED should you provide compelling circumstances that warrant a longer leave of absence.

If a leave of absence is granted, all accumulated sick/personal and vacation days must be exhausted, unless otherwise approved by the ED. Please know that employees will not accrue any sick/personal or vacation days while on leave.

First Step will continue to provide medical benefits as long as the employee pays their contribution each month during the leave of absence.

Acceptance of another job or work at another job while on any type of leave will result in the immediate cancellation of the leave and termination of your employment.

3.6.1 FAMILY & MEDICAL LEAVE (FMLA)

You are eligible to take up to 12 weeks (up to 26 weeks for specified persons related to military personnel – see reasons for leave) of unpaid family/medical leave within any 12 month period and be restored to the same or an equivalent position upon your return from leave provided you: (1) have worked for the agency for at least 12 months, and for at least 1,250 hours in the last 12 calendar months; and (2) are employed at a work site that has 50 or more employees within a 75-mile radius.

FMLA, for any reason other than Military Caregiver Leave, will be calculated using the “look back” method. The “look back” method is a rolling calendar that calculates the balance by looking at the previous 12 months. Any used FMLA during that period is subtracted from the available 12 weeks. Military Caregiver Leave is calculated using a 12-month period measured forward from the first day FMLA is used.

REASONS FOR LEAVE: You may take family/medical leave for any of the following reasons: (1) the birth of a child/ren and in order to care for such child/children; (2) the placement of a child/children with you for adoption or foster care and in order to care for the newly placed child/children; (3) to care for a spouse, child/children, or parent (“covered relation”) with a serious health condition; or (4) because of your own serious health condition that renders you unable to perform an essential function of your position. Leave for either of the first two reasons must be completed within the 12-month period beginning on the date of birth or placement. In addition, in cases where a married couple are employed by the same agency, the spouses together may take a *combined total* of 12 weeks' leave during any 12-month period for reasons one and two, or to care for a parent within reason three.

MILITARY CAREGIVER LEAVE: Eligible employees who are the spouse, child, parent, or next of kin of a covered service member are also eligible to apply for unpaid leave for a maximum of 26 work weeks to care for the service member in a single 12-month period. The single 12-month period is measured from the first day an eligible employee takes military caregiver leave and ends 12 months later. Employees qualifying for both service member family leave and other forms of FMLA leave during this single 12-month period are entitled to only a combined total of 26 workweeks of leave.

A covered service member is a member of the Armed Forces, including a member of the National Guard or Reserves who is: (a) undergoing medical treatment, recuperation, or therapy; (b) in outpatient status; or (c) on the temporary disability retired list. A serious illness or injury is an injury or illness that may render the service member medically unfit to perform their duties; the illness or injury must be incurred or aggravated during active duty. Military caregiver leave may be used to care for veterans discharged or released under conditions other than dishonorable within five years of FMLA usage.

Employees taking military caregiver leave shall provide at least 30 days advanced notice for foreseeable reasons, such as planned medical treatment of the covered service member, unless proven not to be practicable. For unforeseeable reasons, employees shall provide as much notice as is reasonable and practicable. A certification from the service member’s health care provider will be required.

QUALIFYING EXIGENCY LEAVE: Eligible employees who are a spouse, child, or parent of a member of the Regular Armed Forces, National Guard, or Reserves that have been called to covered active duty may take unpaid leave under the FMLA up to a maximum of 12 weeks for certain qualifying exigencies. Covered active duty means: (1) duty during deployment of a member of a regular component of the Armed Forces to a foreign country; or (2) duty during deployment of a member of a reserve component of the Armed Service to a foreign country under a call or order to active duty, including upon notification of an impending call or order, as defined by applicable law.

Qualifying exigencies may include short notice deployment of seven or less calendar days attending certain military events, arranging for alternative childcare and school activities, making financial or legal arrangements, attending related counseling sessions, spending time with the service member who is on short-term, temporary rest and

recuperation leave up to 15 calendar days for each such leave, attending post-deployment activities, parental leave and any additional activities that the agency and the eligible employee mutually agree as to their coverage as a qualifying exigency and the timing and duration of such leaves.

NOTICE OF LEAVE: If your need for family/medical leave is foreseeable, you must give the agency at least 30 days prior written notice. If this is not possible, you must at least give notice as soon as practicable (within one to two business days of learning of your need for leave except in extraordinary circumstances). Failure to provide such notice may be grounds for delay of leave. Additionally, if you are planning a medical treatment, you must consult with the agency first regarding the dates of such treatment. Employee Relations has family/medical leave request forms available. You should use these forms when requesting leave. All notices will be sent via US mail. For an employee wishing to use FMLA for the care of a Military person or due to a “qualifying exigency” the employee is to notify the agency within two days of their receipt of notice.

INCAPACITY & TREATMENT: To qualify for FMLA medical leave you must have a period of incapacity of more than three consecutive, **full** calendar days, and any subsequent treatment or period of incapacity relating to the same condition, that also involves: treatment two or more times, within 30 days of the first day of incapacity, unless ****extenuating circumstances exist, by a health care provider, by a nurse under direct supervision of a health care provider, or by a provider of health care services (e.g., physical therapist) under orders of, or on referral by, a health care provider; or treatment by a health care provider on at least one occasion, which results in a regimen of continuing treatment under the supervision of the health care provider.**

The requirement in the above paragraph of this section for treatment by a health care provider means an in-person visit to a health care provider. **The first (or only) in-person treatment visit must take place within seven days of the first day of incapacity.** The health care provider shall determine whether additional treatment visits or a regimen of continuing treatment is necessary within the 30-day period. If an additional appointment(s) is scheduled, you will provide Employee Relations with the date/schedule of the subsequent appointments.

****** The term “extenuating circumstances” of this section means circumstances **beyond the employee’s** control that prevent the follow-up visit from occurring as planned by the health care provider.

MEDICAL CERTIFICATION: If you are requesting leave because of your own or a covered relation's serious health condition, you, and the relevant health care provider must supply appropriate medical certification. All certification forms and notices will be sent via USPS to your address on file with the agency. You are required to open and read any mail received from the agency’s FMLA administrator in a timely manner. You are also required to update your mailing address with your employer if you have a change in address. When you request leave, the agency will notify you of the requirement for medical certification and when it is due (no more than 15 days after you request leave). You should contact the FMLA administrator if you are unable to return the completed forms by the assigned deadline. To be considered for an extension you must call prior to the due date. If you provide at least 30 days notice of medical leave, you should also provide the medical

certification before leave begins. Failure to provide requested medical certification in a timely manner may result in denial of leave until it is provided.

An employee will be given written notice of any deficiency noted in the medical certificate with an explanation of action needed. The employee will be provided seven days to “cure” any deficiency within the certificate. Failure to provide a corrected certificate within the seven days may result in delay or denial of leave.

The agency, at its expense, may require an examination by a second health care provider designated by the agency if it reasonably doubts the medical certification you initially provide. If the second health care provider's opinion conflicts with the original medical certification, the agency, at its expense, may require a third, mutually agreeable, health care provider to conduct an examination and provide a final and binding opinion. It is the responsibility of the employee to return completed forms to the FMLA administrator. Failure to do so may lead to delay or denial of FMLA leave.

The agency may request recertification for the serious health condition of the employee or the employee's family member no more frequently than every 30 days and only when circumstances have changed significantly, or if the employer receives information casting doubt on the reason given for the absence, or if the employee seeks an extension of their leave. Otherwise, the agency may request recertification for the serious health condition of the employee or the employee's family member every six months in connection with an FMLA absence. The agency may provide the employee's health care provider with the employee's attendance records and ask whether need for leave is consistent with the employee's serious health condition. Any recertification is at the employee's expense and must be returned within 15 calendar days. You should contact the FMLA administrator if the recertification cannot be returned within 15 calendar days.

It is the responsibility of the employee to return completed forms to the FMLA administrator. Failure to do so may lead to delay or denial of FMLA leave.

REPORTING WHILE ON LEAVE: If you take continuous leave because of your own serious health condition or to care for a covered relation, you must contact the agency on the first and third Tuesday of each month regarding the status of your leave and your intention to return to work. In addition, you must give notice as soon as is practicable (within two business days, if feasible) if the dates of the leave change or are extended or were unknown initially.

LEAVE IS UNPAID: Family medical leave is unpaid leave however, your family medical leave will run concurrently with other types of leave, i.e., paid vacation, Short/long term disability, Workers Compensation. The substitution of paid leave time for unpaid leave time does not extend the 12-week leave period.

MEDICAL & OTHER BENEFITS: During an approved family/medical leave, the agency will maintain your health benefits as if you continued to be actively employed. If paid leave is substituted for unpaid family/medical leave, the agency will deduct your portion of the health plan premium as a regular payroll deduction. If your leave is unpaid, you must pay your portion of the premium through the end of your leave. If your payment is more than 15 days late, we will send you a letter to this effect. If we do not receive your cost share

within 15 days after the date of this letter, your coverage may cease. If you elect not to return to work for at least 30 calendar days at the end of the leave period, you will be required to reimburse the agency for the cost of the premiums paid by the agency for maintaining coverage during your unpaid leave, unless you cannot return to work because of a serious health condition or other circumstances beyond your control.

While an employee is on FMLA, leave time off will not accrue.

INTERMITTENT & REDUCED-SCHEDULE LEAVE: Leave because of a serious health condition may be taken intermittently (in separate blocks of time due to a single health condition) or on a reduced-leave schedule (reducing the scheduled number of hours you work per workweek) if medically necessary. If leave is unpaid, the agency will reduce your salary based on the amount of time actually worked. In addition, while you are on an intermittent or reduced schedule leave, the agency may temporarily transfer you to an available alternative position that better accommodates your recurring leave, and which has equivalent pay and benefits.

FITNESS FOR DUTY: Upon the end of an employee's FMLA leave, the employee is required to submit a written and complete "fitness for duty" form indicating their ability to perform all essential tasks related to their responsibilities in a safe manner prior to performing any work or being present at the work area. If, as determined by the agency's determination of significant safety concern, the employee's medical condition warrants the agency can request additional fitness for duty reports from the employee's Health Care Provider during the employee's absence. These requests will be made no more frequently than every 30 days. The request for a fitness for duty report (form) will be accompanied with specific job relates criterion and safety concerns.

3.6.2 BEREAVEMENT LEAVE

First Step is sympathetic to the needs of our employees and the families of employees when there is loss of a loved one. First Step provides Bereavement Leave to full-time employees to allow them to attend to the legal, financial, and emotional needs of their families in the event of such loss.

Full-time employees are eligible for up to three paid days leave upon the death of a loved one. Bereavement needs will be approved by Employee Relations.

An employee will not be eligible to receive paid bereavement time while absent from work because of vacation, designated holiday, or sickness (paid or unpaid).

3.6.3 JURY DUTY LEAVE

A full-time employee who is called to and reports for jury duty will be paid for each day partially or wholly spent in performing jury duty, if that employee otherwise would have been scheduled to work.

Any employee serving on jury duty will be required to turn in the official court check (minus travel reimbursement) or other documentation of compensation to the First Step office, for First Step to deposit in exchange for employee's full wage.

3.6.4 WITNESS LEAVE

Employees who are subpoenaed to serve as a witness in a criminal or civil proceeding will be given the necessary time off. The excused time off will be paid. First Step will not discriminate against any employee who is subpoenaed to serve as a witness. However, the employee must provide Employee Relations with the subpoena.

3.6.5 MILITARY LEAVE

First Step follows the guidelines established by the Uniformed Services Employment and Reemployment Rights Act (USERRA) regarding military leave.

Employees who must be absent from work due to required military duty will be granted an unpaid military leave of absence.

USERRA requires the employee in the uniformed services to give advance notice of service to First Step, unless prevented by military necessity.

An employee on military leave will receive partial pay for training assignments and shorter absences that are less than 14 days. When an employee returns, when provided with satisfactory verification of military pay, First Step will pay the difference between the employee's normal base compensation and the pay (excluding expense pay) received while on military duty.

The portion of any military leave of absence in excess of two weeks will be unpaid. However, the employee may use any available accrued paid time off (vacation, personal/sick leave) for any extended absence.

The continuation of health insurance benefits is available (as required by USERRA and applicable state laws) based on the length of the leave and subject to the terms, conditions, and limitations of the applicable plans for which you are otherwise eligible.

Benefit accruals such as vacation, sick leave, and holiday pay will continue during a military leave of absence.

Employees who are on military leave for up to 30 days must return to work on the first regularly scheduled work period after service ends (allowing for reasonable travel time). Employees who are on military leave beyond 30 days must apply for reinstatement in accordance with USERRA and all applicable state laws.

An employee returning from military leave will be placed in either the position that would have been attained or a comparable position. The returning employee will also receive any benefits the employee would have had at the beginning of the military leave; plus, any additional benefits the employee would have obtained with continuous employment.

The employee, upon release from the Armed Services shall make application for employment within the period specified in the leave or within the period prescribed by any applicable laws or regulations governing the re-employment of veterans, whichever is greater.

If you have questions about military leave, contact the Employee Relations for more information.

3.6.6 PAID PARENTAL LEAVE

The purpose of the policy is to give parents additional flexibility and time to bond with their new child, adjust to their new family situation, and recover from the birth process, if applicable. Flexibility and family-friendly policies are essential to cultivating an atmosphere where employees can thrive professionally without sacrificing essential family obligations.

DEFINITIONS:

Parental Leave: can be taken connected to the birth of an employee's child or the placement of an adopted child within an employee's home.

Eligible Employee: an employee who has been employed by the agency for at least six months and is classified as a full-time, regular employee, as defined by First Step.

ELIGIBILITY: To qualify for parental leave under this policy, the employee must meet the following conditions:

1. The employee must have been employed by First Step for at least six months and be classified as a full-time employee, as defined by First Step.
2. The employee must also meet **one** of the following criteria:
 - a. Have given birth to a child; or
 - b. Be a spouse or committed partner of a person who has given birth to a child; or
 - c. Have a placement of an adopted child who is 17 years old or younger.

LEAVE PROVISIONS: Full-time eligible employees who have been employed for at least six months may take up to 14 weeks of parental leave for a birth or adoption.

1. Six of those weeks shall be compensated at 100 percent of the employee's regular, straight weekly pay, and an additional eight weeks of unpaid leave is available under this policy.
2. All parental leave described in this policy shall be used within a 14-week period following the initiation of the leave.
3. Parental leave must be initiated within a 90-day window of the birth or placement of your child.
4. Parental leave can only be initiated once in a rolling 12-month period.
5. Employees may use accrued personal/sick time and vacation days, as applicable, in exchange for unpaid time.
6. The fact that multiple births or adoptions occur does not increase the length of parental leave.
7. Upon termination of employment, the employee shall not be eligible for payment for any unused parental leave.
8. Benefits will remain the same while an employee is on paid parental leave, but not while on unpaid leave. Employees will be responsible for insurance cost-share and other benefit payments while on unpaid leave.
9. An employer will take disciplinary action, up to and including termination, against an employee who uses parental leave for purposes other than those described in this policy.
10. This parental leave policy will run concurrent with the Family Medical Leave Act (FMLA).

11. If additional leave is needed, other leave options in our Employee Handbook policies will need to be utilized at approval of the agency and supervisors.

NOTICE: An eligible employee shall initially notify their supervisor and Employee Relations of the need for parental leave and include the estimated timing and duration of such leave at least 60 calendar days in advance of the need for parental leave, where practical.

If the need for parental leave is not foreseeable, an eligible employee must give notice of the need to their supervisor as soon as practical. As is the case with all organizational policies, First Step reserves the right to modify this policy.

3.6.7 MAJOR LIFE EVENT LEAVE

Full-time employees experiencing a major life event (death or serious illness of themselves, spouse, parent, etc.), who have been employed for at least one year, may make a request in writing to the Executive Director and Director of Employee Relations for paid major life event leave.

The Executive Director shall respond as to the determination in writing, and if approved, work with Employee Relations and the employee to outline the terms and plan for covering the workload.

Leave shall be up to 150 hours, that must be used within 90-days of the agreed start day. Leave must be taken in 7.5-hour days.

An employee will be eligible for Major Life Event Leave once every three years at the discretion of the Executive Director and Director of Employee Relations.

3.7 WORKER'S COMPENSATION

In accordance with the state worker's compensation law, First Step provides Worker's Compensation. Worker's Compensation is paid for injuries, illnesses or deaths occurring while the employee is engaged in the performance of their duties.

All job-related injuries or illnesses **MUST** be reported within 24 hours of the occurrence to the employee's immediate supervisor and Employee Relations regardless of their nature or severity.

Failure to immediately report an injury or illness incurred while on the job will result in disciplinary action, up to and including termination of employment.

4.0 EMPLOYEE PROFESSIONAL DEVELOPMENT

4.1 TRAINING

Full-time and part-time employees will develop objectives and a training plan with their supervisor as part of their annual evaluation. This evaluation will include an individual needs assessment to determine areas in which professional development is desired and/or required. The evaluation will include the employee's needs as well as programmatic and/or organizational requirements, cultural competency, or other identified needs. Employees may seek any additional trainings and opportunities for professional development throughout the fiscal year and submit requests to their supervisor.

Plans will be revised annually in line with professional development goals. A training log must be submitted to Employee Relations on a quarterly basis.

All full-time and part-time employees are required to attend any agency in-service trainings unless otherwise approved by their supervisor.

All full-time and part-time employees are required, as a condition of employment, to attend the First Step new employee/volunteer training sessions (Core Skills Training) or approved equivalent. This requirement or equivalent must be met within three months of employment unless waived by the ED. If an employee terminates employment with First Step and are rehired 12+ months later, the employee may be required to reattend Core Skills Training. Interns and volunteers who are hired by First Step may be required to reattend Core Skills Training if the training has not been completed in the last 12-months.

4.1.1 ANNUAL TRAINING AS REQUIRED FOR POSITION

Full-time, direct service employees are required to attend 16 hours of ongoing professional development training annually.

Part-time employees are required to attend ongoing professional development training on a pro-rated basis.

All employees must obtain a current CPR/First Aid certificate within six months of employment and are required to recertify every two years. If an employee cannot participate in agency sponsored training, they will have to complete this requirement themselves on their own time and pay for it themselves.

4.2 EMPLOYEE PERFORMANCE APPRAISALS

Employee performance appraisals will be conducted on an annual basis as an employee-development activity intended to assist and motivate employees to attain their maximum potential. An informal interview and written evaluation will be conducted for employees by their immediate supervisor with the following degree of frequency:

- Upon completion of three months of service;
- When special circumstances exist, which make the employee performance appraisal helpful in assisting an employee to meet the standards of performance;
- Annually.

The employee and their immediate supervisor shall sign all performance appraisals reviewed by the ED and placed in the permanent personnel record for a period of six years.

4.3 EMPLOYEE REASSIGNMENT

At First Step, it is our goal to fill any open position with a qualified internal candidate whenever possible. This also applies to promotional opportunities within the agency. This policy is not applicable in the following situations:

- Temporary Openings - a position that is established for a set time period or for the time it takes to complete a project or assignment.
- Reassignment of an employee made at the discretion of the ED in order to correct a faulty placement, eliminate personal disagreements, or for any other reason.

Current employees may apply for any posted position for which they believe they are qualified based on the job description requirements.

4.4 CORRECTIVE ACTION

First Step uses corrective action to ensure employee compliance with the performance standards, ethics, and conduct set forth by the organization. Any corrective action involving loss-of-pay, suspension, or loss of job must be reviewed by Employee Relations and approved by the ED.

1. When corrective action beyond a warning is warranted, an employee may be suspended without pay for a specified period of time. Also, an employee may be placed on an unpaid leave of absence while First Step determines the extent to which discipline may be warranted.
2. First Step may terminate employment at any time, with or without cause, and with or without prior use of any of the above.

Any terminated employee may request an exit interview with the ED.

The presence of a corrective action procedure does not form a contract of employment. The agency has developed a policy that it expects the supervisors to follow when exercising their right to discipline employees.

5.0 EMPLOYEES CODE OF CONDUCT

5.1 DRESS CODE & PERSONAL HYGIENE

Cultural and self-expression is respected; however, the expectation is that you dress appropriately for the job that you have, the work you will be doing that day, the safety of yourself and others, the locations you will be doing that work, and to present yourself and First Step in a respectful manner.

Due to First Step's 501(3)c status, clothing that promotes or endorses a candidate for political office or a specific political party is not permitted. Offensive, discriminating, asserting superiority, and/or hateful attire is not permitted. Clean and damage free clothing is expected.

Concerns with employee attire, appearance, and/or hygiene should be brought to Employee Relations for review. If decided that an employee's self-presentation is not appropriate as outlined in this policy above, it may be required for a staff person to go home to make the necessary changes. If an employee is asked to adjust their attire to comply with policy, there will be no compensation for time in this instance. Repeated violations will result in disciplinary action, up to and including termination.

5.2 ETHICS CONTRACT

A signed ethics contract is required as part of the new employee packet.

5.2.1 WHISTLEBLOWER

First Step requires Board, employees, interns, and volunteers to observe high standards of business and personal ethics when performing their duties and responsibilities. As employees and representatives of First Step, we are required to practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

The Whistleblower Policy is intended to encourage and enable employees, interns, and volunteers to raise any concerns internally so that First Step can address and correct inappropriate conduct and actions. It is the responsibility of all Board members, employees, interns, and volunteers to report concerns about violations of First Step's code of ethics or suspected violations of law or regulations that govern First Step's operations.

First Step encourages its employees, interns, and volunteers to share questions, concerns, suggestions, or complaints with their supervisor. If you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with Employee Relations. Supervisors are required to report complaints or concerns about suspected ethical and legal violations in writing to Employee Relations, who is responsible for investigating all reported complaints. Employees, interns, and volunteers with concerns or complaints may also submit their concerns in writing via the Employee Grievance Form. If absolutely necessary, an employee can submit anonymously through the agency's anonymous feedback survey. If the concern is with the ED, concerns can be brought to the Board Chair via Employee Relations.

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential as best as possible, consistent with the need to conduct an adequate investigation.

The support of all employees, interns, and volunteers is necessary in order for First Step to maintain compliance with laws, regulations and policies. It is contrary to the values of First Step for anyone to retaliate against any Board member, employee, intern, or volunteer who in good faith reports an ethics violation, or a suspected violation. Any Board member, employee, intern, or volunteer who retaliates against someone who has reported a violation is subject to discipline up to and including termination.

5.3 EMPLOYEE CONDUCT

Employees shall not engage in rude or inappropriate behavior towards a client or anyone in contact with First Step. Each employee is expected to work in a cooperative manner with management/supervision, coworkers, clients, and vendors.

5.4 MEDIA & FUNDER RELATIONS

First Step strives to anticipate and manage crisis situations in order to reduce disruptions to our employees and clients. To best serve these objectives, First Step will communicate to the news media and/or funders in a timely and professional manner only through the Executive Director or ED's designated spokesperson(s). Staff speaking on behalf of the agency without designation of the ED will be subject to disciplinary action, up to and including termination.

5.5 CONFIDENTIALITY OF RECORDS

First Step recognizes and respects the right of every client to confidentiality.

Each employee must also respect this right for the client. Staff shall not disclose any information regarding any client without the written informed consent of that client. All client information must be considered confidential. This means that staff shall not disclose any information about the person including the fact that the person is or is not served by our organization to anyone outside of First Step.

While the client is receiving any services with First Step, only the advocate or other specifically authorized personnel may release information. This information may only be released with the knowledge and written informed consent of the client.

The right to confidentiality continues after the client is no longer utilizing the services provided by First Step. The keeper of records or other authorized persons may release information on a specific client to a third party only when the client has signed the approved consent or release-of-information form.

Included in this agreement is that all general information concerning the operation of First Step should also be kept confidential and under no circumstances discussed outside of the organization. General information includes, but is not limited to, First Step's financial data and other non-public proprietary information. Do not share confidential information regarding First Step's business associates or vendors.

Misuse or disclosure by an employee of confidential information, including information about a client, jeopardizes the integrity of First Step and will result in appropriate discipline, up to and including termination of employment.

A signed Client Confidentiality Policy is required as a part of the new employee packet.

5.6 FRAUD/FALSIFICATION OF RECORDS

Any employee, intern, or volunteer of First Step who commits an act of wrongful or criminal deception intended to result in personal or financial gain will be subject to disciplinary action, up to and including termination.

Any falsification of records, including but not limited to, employment applications, client records, calendars/scheduled appointments, attendance statements, timesheets, financial records, and expense accounts by an employee, intern, or volunteer will result in appropriate discipline, up to and including termination.

5.7 HARASSMENT

First Step will not tolerate any form of harassment of any employee, intern, or volunteer. Harassment is defined as any unwelcome verbal or physical conduct or exploitation on account of an individual's race, age, color, religion, sex, sexual orientation, gender identity, gender expression, genetic information, marital status, national origin, citizenship, ancestry, physical or mental liability, veteran or disable status, Vietnam-era military status, political affiliations, height, weight, or any other factor not related to the needs of the job.

Additionally, sexual harassment can be defined as:

- Any unwelcome sexual advances
- Request for sexual acts or favors
- Insulting or degrading sexual remarks or conduct directed against another employee
- Threats, demands or suggestions that an employee's work is contingent upon toleration of sexual advances
- Any other unwelcome sexual statements or actions that are sufficiently severe or pervasive so as to unreasonably interfere with an individual's work performance or create an intimidating, hostile, or offensive working environment.

If any employee feels that they have been a victim of harassment, please bring the complaint to any supervisor or the ED. If an employee feels that they have witnessed sexual harassment, they are also encouraged to report the incident. All such matters will be handled with strict confidentiality and investigated thoroughly. Each employee is expected to abide by First Step's policies and to cooperate fully in any investigation that the organization may undertake.

5.7.1 BULLYING

First Step considers workplace bullying unacceptable and will not tolerate it under any circumstances. This policy applies to all employees, full-time or part-time, interns, volunteers, community partners, and independent contractors. Any employee, intern, or volunteer found in violation of this policy will be disciplined, up to and including termination. Independent contractors found in violation of this policy will be subject to contract cancellation.

First Step defines bullying as persistent, malicious, unwelcome, severe, and pervasive mistreatment that harms, intimidates, offends, degrades, or humiliates an employee, intern, volunteer, or independent contractor, whether verbal, physical or otherwise, at the place of work and/or in the course of employment.

Bullying is offensive and can take the form of physical, verbal, and non-verbal conduct. “Power” does not always mean being a position of authority. It can also include personal strength and the power to coerce through fear or intimidation.

First Step considers the following types of behavior to constitute workplace bullying. However, this list is not inclusive but is offered by way of example:

- False or unsubstantiated claims against another employee
- Physical or psychological threats
- Acts of physical or psychological violence
- Creation of arbitrary standards for one person, imposing unrealistic demands, micromanaging work, or using supervision to intimidate a person
- Inappropriate, exaggerated, or untrue derogatory remarks about someone’s performance, particularly in front of others
- Sabotage of work
- Abuse of authority or power by those in positions of seniority
- Encouragement of others to turn against a targeted employee
- Stealing credit for another’s work
- Exclusion or social isolation
- Work related harassment such as work-overload, unrealistic deadlines or meaningless tasks as compared to rest of employee’s work group
- Consistent ignoring or interrupting of an employee in front of others
- Personal attacks such as angry outbursts, excessive profanity, or name-calling

Legitimate, reasonable, and constructive criticism of an employee’s performance or behavior, or reasonable instructions given to an employee in the course of their employment, will not amount to bullying on their own.

First Step promotes a healthy workplace culture where all employees, interns, volunteers, and independent contractors are able to work in an environment free of bullying behavior.

Therefore, any person who believes they have experienced bullying behavior should report the behavior to their immediate supervisor. If the supervisor is the one violating this policy, then it should be reported to the ED. If during the investigation it is determined that false accusations were made to discredit a person’s supervisor or fellow employees then the false accuser will be subject to discipline, up to and including termination.

5.8 GRIEVANCES

The grievance process was designed to give employees a fair and objective system to raise serious issues and complaints without the fear of retaliation. To provide employees with an accessible method for expressing dissatisfaction and to foster beneficial relations through prompt resolution of work-related problems, First Step has set up the following method for complaints:

Every attempt should be made to resolve the problem with the employee’s immediate supervisor. If concerns are not resolved, employees must obtain First Step’s Grievance Form*. All grievances will be taken seriously and investigated when necessary. All employees should complete, sign, and return the form as soon as possible.

**PLEASE NOTE: Employees must complete the grievance form to file a formal grievance with the agency. Employees should include specific concerns, detailed description of the issue, examples if possible, and the approximate day and time of the occurrence. Complaints made through First Step's anonymous feedback survey are not considered a formal grievance and do not follow the same method outlined in this policy.*

Employees will not be discriminated against, harassed, or suffer any retaliation as a result of filing a grievance or participation in the investigation of a grievance. The employee has the right to appeal directly to Employee Relations, Executive Director, and then the Board Chair.

If a satisfactory resolution has not been determined at the end of seven working days, the employee may submit an appeal. The appeal needs to be in writing, indicating the nature of the complaint, and given to the ED.

The ED will arrange to meet with the parties involved and will consider all written information and personal statements before rendering a decision. The decision will be forwarded to the employee and other parties concerned within 15 days from the date of the meeting.

This grievance policy statement does not apply to disciplinary action.

5.9 SAFETY

At First Step, the safety of our clients, volunteers, and employees is extremely important. In order to ensure safety for everyone, the following safety guidelines must be adhered to by all employees, interns, volunteers and clients.

1. All client and volunteer accidents or injuries must be reported immediately to the employee's supervisor. An accident report must be completed for any accidents or injuries regardless of severity. The report must be forwarded to Employee Relations within 24-hours.
2. Please always use common sense. It is the most important safety rule.
3. Horseplay in work areas will not be tolerated.
4. First Aid supplies are available in the office area and locations around the work sites.
5. Report all threats or potentially harmful situations immediately to your supervisor. Do not wait. Take all threats seriously.
6. All locations have site specific safety procedures. Please refer to your location's safety information.

State of Emergencies or Agency Declared Emergencies allow for ED creation of temporary policies for Board approval. With Board approval, these policies are a part of the Employee Handbook until expired or removed. They will be listed under "Temporary Agency Policies."

5.9.1 WORKPLACE VIOLENCE

To maintain a safe workplace environment, we have established the following guidelines when dealing with workplace safety issues. Consequences of these behaviors will result in disciplinary action, up to and including termination.

- Any form of violent and/or threatening behavior, including verbal and non-verbal threats and related actions, will not be tolerated.
 - Destruction or defacing of agency property

- Weapons of any description at work
- Fighting or attempting to injure others
- Use of profane and abusive language toward other employees, supervisors, or any other person associated with First Step in any capacity
- Personal, sexual, or any other forms of harassment or bullying
- Any threat or gesture will result in disciplinary action, up to and including termination.
- Employees who experience any violent or threatening behavior must report it immediately to a supervisor or Employee Relations. First Step will ensure that each allegation is taken seriously and thoroughly investigated.

5.9.2 WEAPON FREE WORKPLACE

At First Step, the safety of our employees is extremely important to us. To ensure that First Step remains a safe workplace, free of violence for all employees, the possession and/or use of dangerous weapons on agency property is prohibited.

All employees are subject to these terms, including all contract workers, temporary employees, interns, volunteers, visitors, and clients on agency property. A state issued license to carry a weapon does not supersede agency policy. Anyone who is in violation of this policy will be subject to disciplinary action, up to and including termination.

Agency property will be defined as all agency-owned or leased buildings and the surrounding areas, including sidewalks, walkways, driveways, parking lots, gardens, and playgrounds under the First Step's ownership or control. This also includes any place where First Step conducts business. This policy is also in effect for all agency owned or leased vehicles as well as any vehicles that are on agency property.

Dangerous weapons will be defined as firearms, explosives, knives, and any other weapon or object that may be considered dangerous or could be used to cause injury or harm to others. It will be the responsibility of the employee to make sure that any item in their possession is not prohibited by this policy. Employees are encouraged to direct any questions about this dangerous weapons policy to a supervisor.

5.9.3 DISTRACTED DRIVING

First Step is committed to the safety of our employees and would like to increase employee safety by eliminating unnecessary risks behind the wheel. Distracted driving presents serious risks to our employees, interns, clients, contractors, volunteers, and the general public. We are dedicated to ending the causes of distracted driving and have created the following rules which apply to all First Step employees, interns, and volunteers.

Safe operation of any vehicle is the responsibility of the driver and must always be given appropriate attention. Supervisors, employees, interns, volunteers, contractors, and other workers are prohibited from holding, operating, communicating, texting, or watching the screen of a hand-held communication device:

1. While driving an agency vehicle
2. While driving a personal vehicle to conduct business on behalf of First Step
3. While driving on agency property

This includes cell phones, smart phones, laptops, tablet computers, MP3 players, and any other electronic device. This policy is also inclusive of any other activity that may distract the driver.

At First Step, we believe the practice of implementing a distracted driving policy will uphold our commitment to safety. Violations of this policy will lead to disciplinary action, up to and including termination.

5.9.4 REPORTING CRIMINAL CONVICTIONS & TRAFFIC INFRACTIONS

First Step is committed to assuring a safe and secure environment for all. For this reason, First Step has a policy which provides a mandatory process by which all employees and interns must report any post-employment criminal convictions to the First Step ED. This policy will allow First Step to review the circumstances of the criminal conviction(s) to make sure that the employee or intern in question does not pose any unreasonable safety risk.

The standards will apply to criminal convictions reported directly by the employee or intern or identified independently by First Step. This policy will also apply to criminal convictions that may occur after an employee or intern had been formally offered and accepted employment but prior to reporting for work.

Employees and interns must notify their Director of Employee Relations of any driving/traffic infractions (i.e., speeding, unsafe movement, accidents, etc.), criminal convictions, felony, or misdemeanor and/or pending felony charges or placement on the Central Registry as a perpetrator within 24 hours of the event or at the first possible opportunity if the employee is incarcerated.

A failure to report a criminal conviction or traffic related infraction will subject the employee or intern to appropriate disciplinary action, up to and including termination. Background and driving checks are completed again every two years.

5.9.5 FIRE PREVENTION

Please note the following fire prevention actions:

1. All First Step employees should familiarize themselves with the location of all fire exits, alarms, and extinguishers.
2. Electrical equipment should be turned off when not in use, unless specifically requested by management to leave on (e.g., leaving computers “on” but logging off at the end of the business day).
3. Employees should notify a supervisor of any equipment that has cracked or exposed wiring that could pose a fire hazard.
4. Burning candles and space heaters are not allowed at any location where First Step conducts business. They will be removed immediately if seen.

5.9.6 BLOODBORNE PATHOGENS EXPOSURE CONTROL

Bloodborne pathogens are microorganisms in human blood that cause disease in humans. They include, but are not limited to, the Hepatitis B Virus (HBV) and the Human-Immunodeficiency Virus (HIV).

Occupational transmission of HIV is rare, but the lethal nature of HIV requires that we take every possible measure to prevent exposure.

The OSHA standard mandates engineering controls, work practices, and personal protective equipment that, coupled with employees' training, will reduce the on-the-job risks for all employees exposed to blood.

In order to protect yourself and others, we ask that each employee adhere to the following universal precautions:

- Hands should be washed immediately if they become contaminated with blood or other body fluids.
- Gloves and/or masks should be worn whenever there is a possibility of contact with body fluids.
- Spills of blood or blood-containing body fluids should be cleaned up in accordance with our written Exposure Control Plan.
- Employees who have open lesions, dermatitis, or other skin irritations are required to cover these with protective covering and use latex gloves when participating in activity which involves the possibility of contact with body fluids or other contaminants.
- Any hazardous material must be discarded in accordance with our written Exposure Control Plan.
- Contaminated equipment that is reusable should be decontaminated and/or sanitized.

5.10 REMAINING ON PROPERTY

Employee presence on First Step property other than work hours is not permitted. At the conclusion of your shift, we ask that you leave the property.

If you are on a suspension, designated leave of absence, or have been terminated from First Step, you must have the permission of the ED or designate to be on First Step property at any time.

5.11 SMOKE-FREE/TOBACCO-FREE WORKPLACE

A smoke-free and tobacco-free environment helps create a safe and healthy workplace. Smoking is defined as the use of any smoke-producing product, such as cigarettes, cigars, pipes, cigarillos, mini-cigars, hookahs, E-cigarettes, vaping, or any other form of electronic smoking devices or electronic nicotine delivery systems. In addition, all use of tobacco products such as “spit tobacco” or “chewing tobacco” are also prohibited.

Smoking and the use of chewing tobacco is prohibited in all enclosed areas of the worksite without exception including agency owned vehicles, the playground, and the ARK.

All materials used for smoking or chewing of tobacco in a designated area, including butts, matches and spit containers will be extinguished and disposed of in appropriate containers.

This smoke-free and tobacco-free policy applies to all employees, interns, volunteers, clients, visitors, vendors, and independent contractors.

5.12 ALCOHOL & SUBSTANCE ABUSE

First Step is committed to protecting the safety, health, and well-being of its employees and clients. First Step recognizes that abuse of alcohol and other drugs compromises this dedication and poses very serious risk. Therefore, the unlawful manufacturing, distribution, dispensing, possession, transfer, sale or

use of illegal drugs by employees is strictly prohibited. Consequences for violating these prohibitions will result in discipline up to and including termination and/or referral for assistance.

When there is reasonable suspicion of alcohol or substance abuse, an employee will take whatever medical and physiological examinations the ED may require subject to limitations imposed by the law. Refusal to submit to these examinations will result in immediate termination.

This policy is adopted pursuant to the Drug-Free Workplace Act of 1988 (pub. L-100-0692, Title V, Subtitle D). As a condition of employment, the employee will:

- a) abide by the terms of this policy; and
- b) notify their supervisor in writing of their conviction for a violation of a criminal drug statute occurring in the workplace not later than five calendar days after such conviction.

Appropriate action will be taken against any employee who is so convicted, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or the convicted employee may be required to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency.

5.12.1 POST ACCIDENT/INJURY DRUG & ALCOHOL TESTING

All employees, volunteers, and interns who require more than first aid after an accident or injury while on agency time will be required to take a drug and alcohol test. Failure to take the test immediately following treatment for the accident or injury will result in termination.

5.13 PERSONAL PROPERTY

First Step does not assume responsibility for theft, loss, or damage to the personal property of an employee.

5.13.1 SOCIAL MEDIA

At First Step we understand that social media can be a fun and rewarding way to share our life and opinions with family, friends, and coworkers. We recognize that the internet provides unique opportunities to participate in interactive discussions and share information on using a wide variety of social mediums, such as Facebook, Twitter, blogs, wikis, Instagram, YouTube, and chat rooms. However, use of social media can pose risks to First Step's confidential and proprietary information, reputation, and can jeopardize our compliance with grants, as well as violate federal and state laws.

To minimize these business and legal risks, to avoid loss of productivity, distractions from job performance and to ensure that First Step's IT resources and communications systems are used only for appropriate business purposes, First Step has established the following guidelines and rules regarding social media.

This policy applies to all contracted employees, paid and unpaid interns, volunteers, and contracted people.

All of First Step's other policies that might apply to use of social media remain in full force and effect. Social media should never be used in a way that violates any other First Step policies or

obligations. If your post violates any policies in another forum, it will also violate them in an online forum. Examples of violations include, but are not limited to the following:

- Violate First Step's IT resources and communications systems policies
- Violate confidentiality and proprietary policies
- "Friending" or any other form of contacting and/or communicating with First Step clients through any personal social media outlet
- Circumvent First Steps' ethics and standards of conduct policies
- Defame or disparage First Step, its clients, partners, suppliers, vendors, or other stakeholders
- Harass other employees in any way
- Circumvent policies prohibiting unlawful discrimination against applicants for employment, current employees, or past employees
- Violate privacy policies
- Violate any other laws or ethical standards such as using social media in a false or misleading way, claiming to be someone other than yourself, or that you are a spokesperson for First Step and that your views are those of First Step

The use of social media and networking for personal reasons while on work time or work provided equipment is prohibited. Use of First Step's email address to register on any form of social media, networking, or other online tools designed for personal use is also prohibited.

Violation of this policy will result in disciplinary action, up to and including termination.

5.14 AGENCY PROPERTY

All employees are expected to exercise care in their use of agency property and to utilize such property only for authorized purposes. This includes agency properties such as phones (desk and cell phones), computers (desktop and laptops), webcams, hot spots, letterhead, business cards, office supplies, donations, or any other First Step materials, devices, and equipment. Some First Step property, and their features, have specific policies or guidelines employees are expected to abide by. Employees will fill out agency property check-out-forms.

Negligence or unauthorized removal or use of First Step property will result in discipline, up to and including termination.

5.14.1 MONITORING & USE OF AGENCY DEVICES

First Step provides employees with computers, desktop and/or cell phones, other digital equipment, and access to the in-office internet to be used in the performance of the employees' work. First Step may monitor usage of these devices at any time. Use of an agency phone, computer, and/or the internet for anything other than business purposes will result in disciplinary action, up to and including termination. This includes, but it not limited to, illegally downloading electronic files and the downloading of profane or sexually explicit materials.

Agency email, voicemail, and calling and texting via agency phones are to be used for agency related purposes only. All communication on an agency device is the property of First Step. First Step reserves the right to monitor all email, voicemail, call logs, text messaging, and internet usage. Email is to be regarded as the equivalent of a business memorandum, and neither email,

voicemail, text messaging, calling, nor the internet, may be used to violate First Step's anti-harassment policy.

If an employee needs to use their agency provided property, such as a cell phone, for personal use without permission of the Direction of Operations, the employee will be expected to reimburse the agency for all costs/charges relating to personal use.

5.15 TECHNOLOGY & DIGITAL SERVICES

First Step is committed to maintaining clients, employees, and volunteers' privacy and safety while continuing to provide the same client centric and empowerment-based services over technology as we would during an in-person session.

The following policies will provide general agency technology guidelines as well as clear expectations and agency standards on use of agency technology and the delivery of digital services. Additionally, the following policies are to ensure all First Step staff are adequately protecting themselves and program participants.

5.15.1 SECURITY & PASSCODES

Employees are responsible for safeguarding their agency technology and equipment. Therefore, employees must assign a timeframe for their phones, computers, and other devices to automatically log-out and lock, requiring a secure password for reentry. Employees may be required to share passcodes with their supervisors or other leadership whenever changed. Passcodes to any device, including but not limited to phones, computers, voicemails, client database, EVS, emails, should never be shared with anyone outside of leadership when requested. Do not leave a workspace with your devices unsecured.

5.15.1 AGENCY EMAIL

We understand that employees use email daily to communicate with co-workers, clients, volunteers, and community partners. However, communicating through email may present certain confidentiality and safety challenges, especially for program participants.

EMAIL SIGNATURE: Employees and interns are to use the Agency's branded email signature template.

SPAM/PHISHING EMAILS: When an employee suspects that they have received a spam and/or phishing email that poses potential risk to the agency, they are required to forward the compromised email to First Step's IT affiliate asking for the email to be reviewed. Then, the employee will email All Staff informing them that the suspicious email has been reported and should be deleted.

If a suspicious email has been opened, responded to, or otherwise interacted with (i.e., open a link), the employee should contact First Step's IT affiliate to ensure their system has not been compromised.

All employees are expected to follow the guidelines below to ensure email communication is kept as confidential as possible.

EMAILING CLIENTS: Employees are required to speak with the client and discuss the best way to communicate with them. If their preferred method is email, the employee should make sure to review the potential risks and safety concerns with the client. For example, emails accidentally being forwarded to or read by someone the email was not intended for.

Employees should also encourage clients to delete messages they have sent and received, including erasing their deleted folder. If a safer way to communicate is discovered, employees should discuss this with the clients.

Safety concerns should be discussed in length and employees should ensure the client understands all potential risks and make notes of this discussion in the client database.

If the client would still prefer email communication, the employee must:

1. Not store clients' names and/or email addresses in contacts or address books
2. Not print out email communication. If it is necessary to print out an email, it must be shredded as soon as it is no longer needed
3. Not download or otherwise save email communication to any agency or personal computer and/or devices
4. Delete emails and communication threads from clients on a regular basis. Preferably weekly. This includes deleting the sent and deleted folders
5. Since contact information is not to be saved in an employee's address book, employees are required to double check the email address before communication begins. This is especially important since many email platforms have an autofill option. This will ensure the email is being sent to the proper person

EMAILING ABOUT CLIENTS WITHIN THE AGENCY: Employees should avoid emailing co-workers about clients who are actively seeking or attending services. If an employee needs to process a situation about a client with their supervisor or another employee, these conversations should take place over the phone or in person.

If sending an email is necessary, employees should avoid including any part of a client's name, contact information, other personal identifying information.

EMAILING COMMUNITY PARTNERS/OTHER PARTIES ABOUT CLIENTS: Emailing community partners and/or other outside agency parties about clients should be avoided and other forms of communication should be used. Even encrypted emails can leave a digital trail with client information.

To communicate via email with a community partner or other party about a client, employees must obtain an authorization to release information from the client. Employees will only be able to share specific information the client has given permission to release within the specific time frame stated on the form.

Employees must inform and make sure clients understand the risks of sharing information via email to ensure the client is making an informed decision. For example, we cannot control what another person does with their information once an email has been received.

5.15.2 AGENCY CELL PHONES

Agency provided cell phones offer an additional form of communication for employees and clients. However, there are also increased risks when using text messages as a form of communication, including mandatory reporting disclosures, safety, and increased communication comfortability.

On agency provided and client cell phones, both the sender and receiver, have a shared history of the entire conversation thread, including dates, time, and location. This information has the potential to pose major privacy and safety risks for the client. Talking with clients about the possibility of monitoring software, online backups, whose name is on the cell phone account, who pays the phone bill, and who may have physical access to their phone, is important to ensure safety and the risks associated with these outcomes.

Cell phones issued by First Step to an employee are First Step property. Employees are required to make their agency provided cell phone available to the Executive Director, directors, supervisors, or Employee Relations when requested for any reason, including but not limited to software upgrades, replacement, or inspection.

Upon termination of employment, both voluntarily and involuntary, employees are required to turn in their agency provided cell phone, all coordinating accessories, and any other technology devices provided to the employee by the agency and sign their equipment check-out form.

ELIGIBILITY: To qualify for an agency provided cell phone under this policy, the employee must meet the following conditions:

1. Primarily work in a remote or mobile capacity outside of First Step's Wayne and Plymouth locations.
2. Are required to consistently connect with community partners whom the employee works closely with on a regular basis.
3. Regularly work with a client who, for either safety, health, or other personal reasons, requires virtual or remote service options.

SECURITY: Employees are responsible for the agency provided cell phone and the safeguarding of information that may be temporarily kept on the device. Therefore, employees must assign a secure passcode that is required to unlock the phone. This passcode should be shared with their supervisor every time it is changed/updated.

When Employees are issued an agency provided cell phone, First Step's IT affiliate will contact the employee and set up Mobile Device Management (MDM). They will grant access to certain apps and block others. If an employee needs an app that is not on their phone, the employee will need to contact their supervisor and the Director of Operations.

Employees will be expected to reimburse the agency for any and all costs or charges related to personal use of the agency provided cell phone. This includes but is not limited to app purchases or services that have been added without agency authorization.

Employees should save as little information as possible on agency provided cell phones. Employees are not to store any of their personal information on their agency provided cell phone for any reason. Employees are not to save any part of client's name, initials, contact information, other personal information, or any communication that is sensitive in nature.

Employees should never offer to or store evidence for clients. Employees should discourage clients from sharing pictures or videos of abuse or forwarding abusive messages. If a client shares this type of information with an employee, they should process with their supervisor before responding to the client.

Employees are always required to keep their agency provided cell phone with them during work hours and secured during off hours. If an agency provided cell phone is lost or stolen, the employee must notify their supervisor, Director of Operations, and the IT provider immediately. If a client requests to use an agency provided cell phone, the phone call must be monitored. Agency provided cell phones should never be given to children.

TEXT COMMUNICATION: Text messaging should be limited and should not replace providing in-person or phone safety planning, crisis advocacy, emotional support, or counseling. Text message communication should be limited to communication like:

- Where and when you are meeting a client
- Where the client should park
- Confirming and appointment time, cancellation, and/or rescheduling
- A requested address or referral

Text messaging conversations can feel more comfortable and casual in nature. Employees should always keep text communication clear and professional. Employees should never send or respond to emoji's, pictures, GIFs, and/or other forms of non-text communication. Should a client communicate with the employee in this way, the employee should not respond to the text message and should call the client directly.

Since contact information is not saved, employees are required to double check the phone number before communication begins. This is especially important with phones that have an autofill option. Failure to double check the phone number may result in sending communication to the wrong person.

Employees are required to establish a method to verify identity with each client, this may include a previously agreed upon code word or phrase. This is especially important if someone other than the client may have access to the client's personal device.

Text messages sent through an agency provided cell phone should never reveal the client's name, assailant's name, family member's names, and/or any other personally identifying information for any reason in any instance.

Employees should check in regularly with the client to make sure text messaging continues to be a safe method of communication. If the employee or client becomes uncomfortable with text messaging, the employee should discuss alternative methods for receiving services.

All text messages conversations should be deleted in their entirety at the end of each workweek.

CONFIDENTIALITY & MANDATED REPORTING: Before engaging in text message communication with a client, the employee should discuss the following with clients during the intake process:

- Potential safety risks
- Mandatory reporting laws, including Adult Protective Services
- Confidentiality risks
- Miscommunication – i.e., text can be hard to interpret.

This should be discussed in length and employees should ensure the client understands all potential risks and make notes of this discussion in the client database.

Once text messaging as a form of communication is considered safe by both the client and employee, the first time a conversation is initiated with each client, the following text message disclaimer regarding messaging limitations, safety, and mandatory reporting requirements should be sent:

"When choosing to participate in text messaging conversations with First Step, the information you choose to share with First Step will be kept confidential to the greatest extent allowed by law. Your personal information will not be shared without your written permission. However, First Step staff may be required by law to report certain situations, even without your permission, such as suspected child abuse or neglect or threats to harm yourself or others. Please acknowledge the receipt of this message and consent to receiving text messages from our agency."

Employees should make a note in the Database with the day and time the text message disclaimer was sent to the client.

5.15.3 VOICEMAIL

Employee's voicemails should be checked several times throughout the workday. Ideally, all phone calls should be returned within 24-hours. There may be identified exceptions within your program. Work with your supervisor and process the expectations. These may vary by program.

Voicemail recordings left by a client should be deleted as soon as they have been listened to. If this is not possible, previous voicemail messages should be deleted at the end of each workweek. If a concerning voicemail is left, process with your supervisor. If a voicemail that was intended for another person was left, either forward the message to the appropriate person or call the intended employee and relay the message.

GREETINGS: Voicemail greetings are to be set up to include the employee's name, position, and general availability. For example, "Monday through Friday, 9:00 am to 5:00 pm." Employees can decide, based on their comfort level, if they use only their first name or first and last name.

Approved voicemail greeting verbiage examples are provided to employees during new hire orientation.

5.15.4 AGENCY VIDEOCONFERENCING (FOR ADVOCACY)

The safety of using videoconferencing platforms, such as Zoom, depends on the security of all computers and/or personal devices involved. Employees must make sure that clients who would like to participate in videoconferencing advocacy are informed and understand the safety and security risks involved.

Videoconferencing with other staff and external members about non-confidential matters will not have the same expectations and restrictions set by First Step as videoconferencing with clients or about clients does. However, considering the safety and the risk that any videoconferencing platform could pose during your meetings, supervisions, trainings, presentations is very important. Therefore, the guidelines outlined below may be best practice for non-client meetings, as well.

SAFETY PLANNING FOR VIDEOCONFERENCING ADVOCACY: Employees must discuss the following with clients during the intake process before a videoconferencing advocacy session takes place:

Discuss the possibility of...

- The computer and/or personal device being monitored by someone.
- Someone knowing who the client is speaking to.
- Someone seeing when videoconferencing calls are taking place or are scheduled to take place.
- Someone seeing how long the videoconferencing advocacy sessions are.
- The conversation being overheard by someone, especially as videoconferencing allows clients to connect to advocacy sessions anywhere (car, school, coffee shop, etc.).
 - *Due to this, discussing the importance of making sure clients are joining sessions from a private space is important and expected.*

The details surrounding this discussion should be put in the client database.

If an employee is unsure about the safety and security of the client's computer and/or personal device, the employee should explore other forms of communication. If it determined the videoconferencing advocacy sessions is still what works best for the client, then the employee should be cautious about what information is being shared during the session.

VIDEOCONFERENCING ADVOCACY GUIDELINES:

Safety: Employees are to set a plan of action with each client prior to using videoconferencing for advocacy in the event of dropped internet connection or if the assailant unexpectedly enters. Planning for unexpected events will help prepare clients and employees to know what to expect should a session need to be abruptly ended or the call is dropped. Therefore, employees and clients should decide on the following:

- a. If the client will call the employee back or if the employee will call back, it is preferred that the client always call the employee back.
- b. Length of time to wait before attempting to reconnect.

- c. The best way to reach out if the session is unable to be reconnected or if client cannot reconnect for safety reasons.

Employees should frequently check in with clients to make sure that videoconferencing continues to be a safe way to communicate. Employees should continue to offer other means of communication, including phone and in-person advocacy.

Notes surrounding the established plan should be put in the client database.

Recording: Employees should never record the video and/or audio when speaking with clients via videoconferencing. Recording sessions could create confidentiality issues and safety concerns for the clients.

Accounts: Employees should use agency accounts to communicate with clients, employees are not to use any personal accounts or device when communicating with clients at any time for any reason. All agency related communication should only take place on agency provided computers and/or devices.

Issues or Concerns: When concerning or unforeseen things go array in a session, that are outside of normal technology issues (dropped connections, freezing internet) employees should process with their supervisor.

SETTINGS & CONSIDERATIONS FOR ADVOCACY:

1. Employees should not use the First Step branded backgrounds or profile pictures for client appointments. Employee should only use generic office-style backgrounds. The branded First Step background is only to be used for community partner meetings, trainings, agency meetings, etc.
2. Employees are not to create recurring meeting links for non-registration required events with clients. That way, the link to join is always unique for each meeting.
3. Employees should be mindful and intentional about how client/employee meetings are labelled. Meeting names may show up in recent meeting history. If clients are being monitored by an assailant, this may indicate that the client is seeking help and may disclose the name of the program and employee.
 - a. Programs should consider not attaching an employee's names to the video in case someone unexpectedly walking into a session or is monitoring the session.
 - b. Employees should consider discussing with the client how they would like their advocacy meetings to be labelled
4. All employees using videoconferencing for advocacy sessions will be password protected by the agency administrator. This setting will not be removed. Clients must have the link with the imbedded password to join a session.
5. Clients will automatically be put in the "waiting room" once they join the meeting. Employees must grant them access to the meeting. This setting should not be turned off for client sessions.
6. Once the client has joined, the employee should lock the meeting. This will provide secondary protection and prevent anyone else form accessing the meeting.

7. If an unauthorized or unknown person attempts to join the meeting, the meeting should be ended. The employee should follow the safety plan as outlined by the client.
8. Employees should show clients how to clear their videoconferencing history and should encourage them to do so after each session. Employees are expected to clear the videoconferencing history weekly.

If an employee is found in violation of this policy, disciplinary action will be taken up to and including termination of employment.

5.15.5 PERSONAL COMMUNICATIONS & DEVICE USAGE

It is important to keep our phone lines free for work related calls. Employees should not receive personal calls on an agency phones unless it is an emergency.

Generally, personal cell phones or other mobile devices (e.g., iPads) should not be used during work hours for personal reasons. This includes but is not limited to phone calls, texting, emails and/or any personal internet usage. If necessary, please keep personal calls to a minimum. It is advised that employees utilize their lunch periods or break periods to make personal calls.

Employees are not to use their personal cell phones or other devices to communicate with clients, about clients, or any other matter protected by our agency confidentiality policy. This includes text messages, phone calls, emails, and any other audio or electronic means of communication.

NOTE: Any active, temporary, and/or Board approved Employee Handbook Policies will be included as an addendum to this document when active.

6.0 GRANT REQUIRED POLICIES

6.1 SEXUAL MISCONDUCT & DOMESTIC VIOLENCE IN THE WORKPLACE

The purpose of this policy is to create a supportive, safe, and healthy work environment for all employees as well as prevent and reduce the occurrences of all forms of violence at the agency. First Step recognizes and understands the unique issues that domestic violence, sexual misconduct, and dating violence can have on its employees, clients, and volunteers. The agency also understands that violence which occurs outside of the agency is still an agency-related issue. To further help sustain First Step's commitment to safety, the agency is instituting this policy to outline the prevention of domestic violence, sexual misconduct, and dating violence within the agency.

First Step will as a part of this policy, support and provide comprehensive workplace education and training, establish responsive policies to support those impacted by violence, to discipline and hold employees who are perpetrators of violence accountable.

First Step will not tolerate any form of domestic violence, sexual misconduct, or dating violence in the workplace, and is committed to maintaining an environment that is free from all forms of harassment and intimidation.

DEFINITIONS:

Adjudication: Adjudication includes a conviction, issuance of a final protection order, court-ordered diversion, or other judicial finding that the employee, volunteer, consultant, or contractor has engaged in domestic violence, dating violence, sexual assault, or stalking.

Domestic Violence, Dating Violence, Sexual Assault, and Stalking have the meanings given in 34 U.S.C. § 12291(a).

Sexual Misconduct: Sexual misconduct includes sexual assault, stalking, and sexual harassment.

Sexual Harassment: Sexual harassment means unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when this conduct explicitly or implicitly affects an individual's employment, unreasonably interferes with an individual's work performance, or creates an intimidating, hostile, or offensive work environment, whether such activity is carried out by a supervisor or by a co-worker, volunteer, or contractor.

Examples of prohibited conduct include, but are not limited to, lewd or sexually suggestive comments, off-color language or jokes of a sexual nature, slurs, or verbal, graphic or physical conduct relating to an individual's gender, or any display or sexually explicit pictures, greeting cards, articles, books, magazines, photos, or cartoons.

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct or communication constitute harassment when:

1. Submission to the conduct or communication is made a condition of employment;
2. Submission to or rejection of the conduct or communication by an individual is used as factor in an employment decision affecting the employee; or
3. The conduct or communication has the purpose or effect of substantially interfering with an individual's employment or creating an intimidating, hostile, or offensive work environment.

An individual is considered to be in the “workplace” of First Step while in, or using the resources of, First Step’s offices or facilities, using agency equipment or vehicles, engaging in approved telework, on work-related travel, or otherwise conducting business on behalf of First Step. The availability and nature of the response to a workplace-related incident may depend on the location at issue.

Agency-Related Incidents: Agency-related incidents of sexual misconduct, domestic violence, and dating violence include acts, attempted acts, or threatened acts by or against employees, interns, consultants, volunteers, or community partners, that occur in the agency or that occur outside the agency but have an impact on the agency or otherwise undermine the ability of First Step to carry out its mission.

INDIVIDUALS COVERED UNDER THIS POLICY:

To the extent possible, individuals covered under this policy may include but not be limited to:

1. Full-Time Employees
2. Part-Time Employees
3. Interns
4. Volunteers
5. Community Partners
6. Contract Workers
7. Board Members
8. Any individual, acting on behalf or representing First Step in any location or at event controlled or sponsored by First Step

For the purpose of this policy, individuals covered under this policy will be collectively referred to as “employees.”

EMPLOYEE CONFIDENTIALITY: Confidentiality refers to every person's legally protected right to privacy. First Step will provide the maximum degree of confidentiality to employees, who voluntarily choose to disclose or if First Step gains knowledge of an employee’s disclosure regarding domestic violence, sexual assault or dating violence, as permitted by state and federal law in accordance with the requirement, as a nonprofit service agency, for accountability to the community.

Employees should note that confidentiality will be waived in situations which require emergency attention or action such as the employee’s injury or illness. When an employee is unconscious and cannot ask for help or when the employee indicates they need help, the employees’ rights to confidentiality are waived in favor of the professional duty to secure assistance for the employee. Only information which is necessary to secure assistance for the employee may be given in these circumstances.

In circumstances where there is a legal duty to act or warn (e.g., if an employee threatens harm to themselves or another and there is a reasonable expectation that such action will occur), or in circumstances which mandate reporting to outside authorities’ applicable laws will be followed. However, such disclosures will supply the least amount of information necessary to carry out and comply with the intent of the law.

First Step will provide in advance, when possible, if a disclosure must be shared with other parties for safety purposes. First Step will also provide the name and title of the person who First Step intends to share the employee’s statements along with the purpose and reasoning behind sharing the disclosure.

6.1.1 RESPONSE TO DOMESTIC VIOLENCE

Employees who threaten, harass, or abuse any one either at the agency, or from the agency, while conducting agency related business or activities and/or using any of agency property or agency provided property, including but not limited to computers, phones, FAX machines, mail, vehicles, or other means, will be subject to disciplinary action, up to and including termination.

Employees who become aware of threats or acts of domestic violence that may occur or have occurred at the agency must immediately inform their immediate supervisor and Employee Relations. If their immediate supervisor is not available, Direct Service employees must immediately inform the Director of Programs and Employee Relations. Administrative employees whose immediate supervisor is not available should immediately inform the ED and Employee Relations.

In addition, employees with Personal Protection Orders, bond conditions, probation conditions or civil restraining orders that reference any agency sites, must provide their immediate supervisor and Employee Relations with a copy of the court order. In response to possible threats, the employee's supervisor in partnership with Employee Relations, the Director of Programs, or the ED will undertake an assessment of the risk and implement a safety response plan specific to the circumstances of the threat, implementing security options to minimize the risk. This plan will take into consideration the needs and rights of the targeted employee and others in the agency, maintaining confidentiality when to do so does not interfere with safety needs.

First Step employees are encouraged to inform their immediate supervisor when performance problems arise that are related to a domestic violence concern. In response to such disclosure, supervisors will provide the employee with information about internal and external resources that the worker can choose to access for assistance. Supervisors will also work with the individual to determine if any accommodations, such as available leave time or workplace safety precautions, are needed.

Employees who are surviving violence, and employees who are concerned about coworkers who might be victims, are encouraged to report their concerns to the agency. Such a report can be made to any supervisor, Director of Programs, Employee Relations, Executive Director or via the anonymous feedback survey link.

Internal resources include speaking with your supervisor and contacting your insurance provider to determine mental health and counseling services available or accessing the Employee Assistance Program. External resources may be obtained through the employee contacting information for neighboring domestic and sexual violence service providers where confidential services may be arranged.

6.1.2 RESPONSE TO SEXUAL MISCONDUCT & HARASSMENT

Sexual misconduct and harassment, as defined above, will not be tolerated amongst employees, regardless of gender or sex. Any employee who believes this policy has been violated is required to report the incident to the employee's immediate supervisor, other supervisor, Employee Relations and/or the ED. First Step will not permit or tolerate any form of retaliation against an employee for reporting, in good faith, any incident of claimed harassment.

It is each employee's responsibility to eliminate all forms of harassment. In particular, it is the responsibility of each employee to prevent such behavior from occurring within their work area, and to provide a work environment free from all harassment. It is the responsibility of each and every employee of First Step to report any and all incidents of harassment forbidden by this policy. First Step requires that employees must immediately file a report so that a complaint can be promptly investigated.

6.1.3 LEAVE, SCHEDULE, & SAFETY ACCOMMODATIONS

LEAVE/SCHEDULE: First Step understands that victims and survivors of violence may need time off to obtain legal assistance to help ensure their personal health and safety and/or the health and safety of their child(ren). First Step will work with employees to provide reasonable and flexible options when an employee or their child(ren) becomes a victim of domestic violence, sexual assault, or dating violence.

To request a leave of absence or an intermittent or reduced work schedule employees must:

- Discuss the need for leave or reduced work schedule with their immediate supervisor.
- If the employee's immediate supervisor is not available, the employee should reach out to Employee Relations.
- Submit the Personal Leave of Absence Request form to their immediate supervisor at least 30 days before leave is to begin. However, if the need for leave is unforeseeable, the request for leave must be submitted as soon as practicable.

Please see the agency's Personal Leave of Absence Policy for full policy details.

SAFETY: First Step will provide reasonable accommodations for employees, who voluntarily choose to disclose or if First Step gains knowledge of an employee's disclosure regarding domestic violence, sexual assault or dating violence, in order to maintain their safety and work performance will employed by First Step.

A reasonable accommodation may include, flexible work options, changing of work location or agency telephone number. Employees who would like to request a reasonable accommodation, should partner with their immediate supervisor, and submit their request in writing.

6.1.4 REPORTING VIOLATION OF POLICY & COMPLAINT PROCEDURE

First Step will not retaliate against any person, who in good faith, makes a report under the policy. Anyone who wishes to report a violation of this policy should contact any supervisor, director, Employee Relations, or the ED immediately.

Employees who believe they have been a subject of illegal harassment or discrimination, should report the incident immediately to any supervisor, director, Employee Relations, or the Executive Director. The responding member of leadership will provide the employee with a Grievance Form. All employees should complete, sign, and return the form as soon as possible to the responding member of leadership.

Any supervisor, director, or Employee Relations, who receives the complaint are required to immediately inform the ED of any verbal or written concern or complaint they receive.

If the complaint involved a supervisor the complaint should be filed directly with the Director of Programs, Employee Relations, and the ED. If the complaint involves the ED, the complaint should be filed directly with the Board of Directors.

All complaints will be handled and investigated in a timely manner. Complaints will be handled with sensitivity and respect given the confidential nature of these types of claims. Investigations will be completed within 45 days of the written receipt of information or allegation.

6.1.5 RESPONSE TO EMPLOYEES ACCUSED OF VIOLENCE OR MISCONDUCT

If First Step receives information that alleges or suggests an employee has committed an incident of agency-related violence, as defined in this policy, or if any supervisor or director receives information that any employee has engaged in any incident of agency-related violence, then the matter shall be referred to Employee Relations and the ED for the purpose of investigating the information or allegation.

First Step will conduct an immediate investigation of the information or allegation, which shall be completed within 45 days of the written receipt of the information or allegation.

Every employee is required to cooperate with the investigation, and failure to do so will result in disciplinary action being taken against the uncooperative employee up to and including termination or severance of a contractual relationship.

6.1.6 RESPONSE TO EMPLOYEES ADJUDICATED OF VIOLENCE OR MISCONDUCT

In the event that the investigator reports to the ED that the employee has engaged in an agency-related incident, as defined in this policy, or the employee has been found guilty or liable in a criminal or civil action arising from a threat or act of violence, as defined in this policy, the designated official shall determine whether a continued employment, contractual, or volunteer relationship with the employee would undermine First Step's ability to carry out Office on Violence Against Women (OVW) grant-funded projects.

If the designated official determines that continued employment, contractual, or volunteer relationship with the employee would undermine First Step's ability to carry out OVW grant-funded projects, the ED shall remove the employee from any position that may undermine First Step's ability to carry out OVW grant-funded projects.

First Step may grant an exception and allow an employee, contractor, or volunteer who was previously adjudicated of having used violence by any jurisdiction or previous employer or contractor to occupy a position that could otherwise undermine the ability of First Step to carry out the OVW funded project, so long as First Step can establish that the employee has met the following qualifications:

1. No one affected by the violence used by that employee, will encounter the worker in any First Step controlled capacity.
2. The employee must prove evidence of accountability, restoration, and rehabilitation; and
3. First Step's mission would benefit from the employee's experience.

All terminations of an employment or contractual relationship with an employee pursuant to this provision, as well as any exception granted pursuant to this provision (including the standards First Step relied upon in granting an exception), must be reported to OVW.

6.2 DETERMINATION FOR SUITABILITY – INTERACTING WITH MINORS

First Step is committed to maintaining a safe and supportive work environment for all clients and minor children who participate in First Step services and programs. First Step understands the responsibility we hold when providing services for minor children. We, as an agency, are committed to providing meaningful, respectful, safe, and friendly interactions with all minor clients.

The purpose of this policy is to ensure that minor children are safe while in our care. In order to do this, First Step will make a written determination of suitability before covered individuals may interact with program participants who are minors. Suitability will take into consideration certain factors and will be based on current and relevant information.

It is the intention of First Step to ensure that interactions and relationships with program staff assist in the healing process, and will provide a safe environment for obtaining information, resources, and support for all minor program participants.

DEFINITIONS:

Covered Individual: Is any individual other than a participating minor or client of First Step who is expected and likely to interact with the participating minor. Covered individuals may include employees, consultants, contractors, trainees, or volunteers at First Step.

Participating Minor: All individuals under 18 years old, that fall within the scope section of this condition as it appears and is described on the award document for participating minors.

Interaction: Includes physical contact, verbal, and written communication, including the transmission of images and/or sounds that may be in person or by electronic means. Interaction does not include the following:

1. Contact that is brief and is both unexpected by First Step and unintentional on the part of the covered individual.
2. Personally Accompanied Contact, which is occasional or infrequent and is in the presence of an accompanying adult. First Step will ensure that throughout this type of contact, an appropriate adult will closely and personally accompany and/or remain continuously within view and an earshot of the covered individual.

WRITTEN DETERMINATION: First Step will make a written determination of suitability before covered individuals will be allowed to interact with participating minors. Suitability will take into consideration certain factors and will be based on current and relevant information. Written determination of suitability will be determined by the below factors and will be reexamined every two years.

Background checks/screening will be completed before interacting with a minor. Background checks include the following:

1. Review of Michigan sex offender registry
2. Review of The Dru Sjodin National Sex Offender Public Website

3. Michigan Department of Health and Human Services Clearance
4. Review of criminal history registries via ICHAT
5. Driving Record Clearance

First Step will not determine a covered individual is suitable to interact with participating minor if the person:

1. Withholds consent to a criminal history and background check search
2. Individual knowingly makes or has made false statements that affects or is intended to affect any background search deemed necessary
3. Individual is listed and is registered as a sex offender on the Dru Sjodin National Sex Offender Public Website and/or the Michigan Sex Offender Registry
4. Individual has been convicted of:
 - a. Sexual or physical abuse, neglect, or endangerment of an individual 18 years of age at the time of the offense
 - b. Rape or sexual assault, including but not limited to conspiracy to commit rape/sexual assault
 - c. Sexual exploitation, including but not limited to child pornography or sex trafficking
 - d. Kidnapping
 - e. Voyeurism
5. Individual has been determined by a federal, state, tribal or local government agency as not suitable

PROCEDURE: Director of Employee Relations will complete a background check on all applicants who will be working with minors as defined above. The Director of Employee Relations will inform all potential new hires of this policy and obtain written authorization to perform all required searches. Background checks and results will be completed and reviewed before hire, as well as every two years after hire. Background checks for both current and potential employees, including original pre-hire check, will be kept for 10 years.

Federal law requires that First Step fingerprint all employees and potential employees who work with minors, however, Michigan state law does not require this. First Step has received a written document from the Wayne County Sherriff's department, indicating that by statues, the department is not required to provide finger printing services for nonprofit organizations. This document is kept with all current employee background checks and a copy is filed with all previous employee background checks.

Please note: If a potential employee has a past criminal history, they will still be eligible for hire unless the potential employees has a prior conviction of:

- Sexual or Physical Abuse
- Rape or Sexual Assault, including conspiracy to commit rape or sexual assault
- Sexual Exploitation, including child pornography or sex trafficking
- Kidnapping
- Voyeurism

All hiring decisions regarding a potential employee with a criminal history that does not including the above items, will be made on a case-by-case basis in conjunction with the Executive Director, Director of Employee Relations, and/or the Director of Programs.

6.3 PERSONALLY IDENTIFIABLE INFORMATION & CONFIDENTIALITY BREACH

First Step is committed to maintaining clients, employees, and volunteers legal right to privacy. The agency will continue to provide the maximum degree of confidentiality to clients, employee and volunteers as permitted by state and federal laws in accordance with the requirement as a nonprofit service agency for accountability to the community. However, First Step is required to save data about survivors of domestic violence, sexual assaults, employees, volunteers, and other individuals for program, employment, and logistical purposes.

The purpose of this policy is to assist the agency in handling breaches of confidentiality and personally identifiable information efficiently and effectively.

DEFINITIONS:

Personally Identifiable Information (PII): Information that can be used to distinguish or trace an individual's identify, either alone or when combined with other personal or identifying information that is linked or linkable to a specific individual. 2 CFR 200.79

- a. **Public PII:** Information that is available in public source, such as university listings, telephone books and on public websites. This information includes, first and last names, addresses, work and home telephone numbers, email address and general education credentials.
- b. **Non-PII:** Information that can become PII when additional information is made publicly available in any medium from any source, that when combined with other available information can be used to identify an individual.

PPI is not anchored to a singled category of information or technology but requires a case-by-case assessment of the specific risk that would lead to an individual be identified.

Incident (OMB M-17-12): An occurrence that:

- a. Actually or imminently jeopardized without lawful authority, the integrity or availability of information or an information system.
- b. Constitutes a violation or imminent threat of the violation of the law, security policies, security procedures or acceptable use policies.

Breach (OMB M-17-12): The loss of control, compromise, authorized disclosure, unauthorized acquisition, or any similar occurrence where:

- a. A person other than an authorized employee accesses or potentially accesses PII.
- b. An authorized employee accesses or potentially accesses PII for a reason other than authorized purposes.

A breach is but is not limited to:

- When an authorized user potentially accesses PII by means of a network intrusion
- A targeted attack that exploits website or device vulnerabilities
- An executed attacked through email messages or attachments
- The loss or theft of physical documents that include PII
- The lost or theft of portable electronic devices that store PII
- Inadvertent disclosure of PII on a public website

- Oral disclosure of PII to a person who is not authorized to receive such information
- An authorized user accessing PII for a reason other than an authorized purpose

Breach occurrences may be initially identified as an incident, however, once it is determined the incident includes PII, it is later identified as a breach. The most common example of this is when a laptop or personal electronic device is lost or stolen.

First Step employees, volunteers, or other individual associated with the agency are required to follow the below procedure when a confirmed or suspected breach of confidentiality or PII takes place.

BREACH PROCEDURE:

1. Suspected breaches of PII or if a breach is imminent, must be reported to any supervisor, director, or Executive Director immediately via phone call.
2. In partnership with the supervisor, director, or Executive Director, the involved parties will contact our IT company immediately.
3. In partnership with IT, all involved parties will immediately prioritize and put together a comprehensive examination of what PPI may have been a part of the breach and complete the below process:
 - a. Determine what actions need to be taken to contain the breach or imminent breach
 - i. Shut down compromised system
 - ii. Recover lost data and limit possible damage caused by the breach
 - iii. Prevent further unauthorized access to the system
4. IT will reset passwords or accounts with passwords that may be compromised.
5. IT will follow additional policies and procedures that are in place when PII and other data is compromised.
6. Director of Operations and Executive Director will inform the appropriate contact at any applicable funder, within 24-hours after the occurrence of an actual breach or detections of an imminent breach and will comply with further requested steps.
7. In partnership with the involved parties, the Director of Operations or Programs will contact the individuals affected by the breach.



EMPLOYEE ACKNOWLEDGEMENT

This employee acknowledgement is confirmation that an employee handbook has been received and the following information has been reviewed.

- I have read and understand the First Step Employee Handbook.
- I understand that the Handbook is provided solely for the purpose of information.
- I understand that the contents of the Handbook should not be construed to constitute a contract between my employer and myself or for the provision of any benefits described in this Handbook.
- I agree to conform to the rules and regulations of the agency.
- I recognize that my employment is at-will and can be terminated with or without cause and with or without notice at any time at the option of either the employer or myself.

I understand that my employer reserves the right to alter, amend, modify, change, and/or remove any of the policies or benefits described in this manual at any time.

Employee Name (Printed)

Employee Signature

Date

NOTE: Forward signed document to Director of Employee Relations within 10 business days from date of hire (or within receipt of revised handbook). Keep a copy for your records.