



TO: Personnel Committee
FROM: Jill Trevino
DATE: November 2, 2021
RE: November, 2021 Committee policy updates regarding State and Federal Law

We would like to take the time to update you on the state and federal law changes that are being made within the Employee Handbook in order to maintain compliance and keep up with the everchanging laws and regulations that we must follow as an employer. The current updates listed below include: Victims' Economic Security and Safety Act (VESSA), Non-Discrimination and Anti-Harassment Policy, and a Workplace Violence Policy. We are looking forward to reviewing more Employee Handbook policies at next month's meeting.

Reason for changes: [Victims' Economic Security and Safety Act Leave \(VESSA\) policy updated to reflect current law and legal wording. Currently the VESSA policy is found in 2 sections of the Personnel Code. We would like to have all information located within the policy for the ease of our employees to have everything located in one spot.](#)

CURRENT POLICY:

[Victims of Domestic or Sexual Violence](#)

In accordance with Illinois Victims' Economic Security and Safety Act, an employee who is a victim of domestic or sexual violence or has a family or household member who is a victim of domestic or sexual violence may take up to a total of 12 work weeks of leave from work during any 12-month period to address the domestic or sexual violence. More detailed information can be found in Appendix D.

Appendix D

[Explanation of Victims of Domestic or Sexual Violence](#)

An employee who is a victim of domestic or sexual violence or has a family or household member who is a victim of domestic or sexual violence may take up to a total of 12 work weeks of leave from work during any 12-month period to address the domestic or sexual violence by:

- Seeking medical attention for, or recovering from, physical or psychological injuries caused by domestic or sexual violence to the employee or the employee's family or household member;
- Obtaining the services from a victim services organization for the employee or the employee's family or household member;

- Obtaining psychological or other counseling for the employee or the employee's family or household member;
- Participating in safety planning, temporary or permanent relocation, or taking other actions to increase the safety of the employee or the employee's family or household member from future domestic or sexual violence or ensure economic security; or
- Seeking legal assistance or remedies to ensure the health and safety of the employee or the employee's family or household member, including preparing for or participating in any civil or criminal legal proceeding related to or derived from the domestic or sexual violence.

The employee shall provide his/her supervisor with at least 48 hours advance notice of his/her intention to take the leave, unless providing such notice is not practical. Employees must provide certification to IHLS. An employee may satisfy such a certification requirement by providing a sworn statement of the employee and documentation from a victim services organization, attorney, member of the clergy, or medical or other professional from whom the employee or the employee's family or household member has sought assistance; for example, a police or court record; or other corroborating evidence.

Any and all information received will be retained in the strictest confidence unless written consent is received from the employee, is otherwise required by applicable federal or state law, or is necessary for employment and benefits.

IHLS will not discharge or otherwise discriminate against an employee who is a victim of domestic or sexual violence, nor will IHLS discharge, discriminate, or retaliate against an employee taking leave from work as a result of domestic or sexual violence to seek medical attention, counseling for injuries or psychological trauma, obtaining victim services, relocating, seeking legal assistance, or participating in a related court proceeding.

This Act does not create a right for an employee to take unpaid leave that exceeds the unpaid leave time allowed under, or is in addition to the unpaid leave time permitted by the Federal Family and Medical Leave Act of 1993.

Employees may take such leave without pay or may use available sick leave, vacation leave, or personal leave, as appropriate. An employee granted a leave under this policy will continue to be covered under IHLS' group health, life, and dental insurance plans under the same conditions as coverage would have been provided to any other employee. Any required employee contributions will be either through payroll deduction or by direct payment to IHLS. Employee contribution amounts are subject to any change in rates that occur while the employee is on leave. If an employee's contribution is more than 30 days late, IHLS may terminate the employee's insurance coverage.

PROPOSED POLCIY:

Victims' Economic Security and Safety Act Leave (VESSA)

Pursuant to the Illinois Victims' Economic Security and Safety Act (VESSA) all eligible employees are entitled to take up to 12 weeks of job-protected unpaid leave during any 12-month period for victims or "perceived" victims of domestic, sexual, or gender violence, or any other crime of violence. To be eligible for VESSA leave, employees must be employed either full or part time by IHLS.

VESSA leave shall be granted for any of the following reasons:

1. Seeking medical attention for or recovering from physical or psychological injuries caused by domestic or sexual violence to the employee or the employee's family or household member;
2. Obtaining services from a victim services organization for the employee or the employee's family or household member;
3. Obtaining psychological or other counseling for the employee or the employee's family or household member;
4. Participating in safety planning, including relocation or taking other precautionary actions to help the employee or the employee's family or household member; or
5. Seeking legal assistance or other remedies to secure the health and safety of the employee or the employee's family or household member, including preparing for or participating in any related civil or criminal legal proceeding.

"Family or household member" includes the employee's spouse or party to a civil union, parent, grandparent, child, grandchild, sibling, or any other person related by blood or by present or prior marriage or civil union, other person who shares a relationship through a child, or any other individual whose close association with the employee is the equivalent of a family relationship as determined by the employee, and persons jointly residing in the same household.

Employees may also use VESSA leave consecutively, intermittently or as part of a reduced work week whenever it is necessary. An employee who is entitled to take paid or unpaid leave from employment may elect to substitute any period of such leave for an equivalent period of 12 work weeks of leave for any 12-month period. An employee cannot take unpaid leave that exceeds the unpaid leave time allowed under, or is in addition to the unpaid leave time permitted by FMLA.

IHLS uses a "rolling" 12-month period measured forward from the date an employee uses any VESSA leave. An employee granted leave pursuant to this policy continues to be covered under IHLS's group benefit plans under the same conditions as coverage would have been provided if they had been continuously employed during the leave period. Employees will be responsible for paying their portion of insurance premiums during periods of unpaid VESSA leave. An employee who utilizes VESSA leave will be restored to the same job or a job with equivalent status, pay, benefits, and other employment terms. However, the employee's job protection rights are the same

as if the employee had not been on VESSA leave. Thus, if the employee's position would have been eliminated or the employee would have been terminated if not on VESSA leave, the employee does not have the right to be reinstated.

If an employee does not return to work at the end of the VESSA leave period for any unapproved reason, the employee shall reimburse IHLS for any insurance premiums paid by the Company on the employee's behalf during the unpaid portion of the VESSA leave.

Employees must provide 48 hours advance notice of the need for leave, if such notice is practicable. IHLS will not discharge or take other adverse action against an employee for taking an unscheduled leave if, within a reasonable time, the employee provides IHLS with a sworn statement certifying that the leave was for one of the reasons cited in the law. Taking of VESSA leave may be denied if any of the above requirements are not met.

Employees are required to provide supporting documentation, such as police or medical records, when those documents become available, and must work with Human Resources to discuss appropriate documentation. IHLS will keep confidential the fact that the employee sought leave under the law, the certification, and any supporting documents.

Reason for changes: Non-Discrimination and Anti-Harrassment Policy is found only listed in appendix section of the Personnel Code as Explanation Regarding Harrassment. This needs to be listed as a separate policy and needs to be updated within current law.

CURRENT POLICY:

Appendix A

Explanation Regarding Discrimination

Policies, practices, and procedures are nondiscriminatory when they do not cause an individual or group to be treated less favorably in the terms and conditions of their employment compared to other individuals or groups because of such factors as race, color, religion, national origin, ancestry, sex (including pregnancy), age, physical or mental disability, marital status, past and present status as a member of the military, sexual orientation, or genetic information. Sexual orientation means actual or perceived heterosexuality, homosexuality, bisexuality, or gender related identity, whether or not traditionally associated with the person's designated sex at birth. Sexual orientation does not include a physical or sexual attraction to a minor by an adult.

A. Prohibited Harassment

The IHLS shall be free from harassment. Such illegal harassment may violate the Civil Rights Act of 1964, the Age Discrimination in Employment Act of 1967, and/or the Illinois Human Rights Act as defined in 775 Illinois Compiled Statutes, Chapter 5 as well as other federal and state laws. Illegal harassment will not be tolerated or condoned.

Harassment is defined as:

Any unwelcome advances or requests for favors or any conduct of a nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

It includes, but is not limited to:

- Innuendos, suggestive comments, insults, humor and jokes about any of the categories identified by law, sexual propositions, threats, repeated requests for dates, or statements about other employees, even outside of their presence, of an illegal harassment nature.
- Suggestive or insulting sounds (whistling), leering, obscene gestures, sexually suggestive bodily gestures, "catcalls", "smacking", or "kissing" noises.

- Posters, cartoons, signs, pin-ups, or slogans which are stereotypical;
- Touching, unwelcome hugging or kissing, pinching, brushing the body, coerced sexual intercourse, or actual assault;
- Offensive or derogatory epithets, slurs, negative stereotyping jokes;
- Threatening, intimidating, or hostile acts that relate to race, color, religion, national origin, ancestry, sex (including pregnancy) , age, physical or mental handicap, marital status, status as a veteran, or sexual orientation;
- Unwelcome comments about a person's religion or religious garments; or
- Written or graphic material that denigrates or shows hostility toward an individual or group because of race, color, religion, national origin, ancestry, sex, pregnancy, age, physical or mental handicap, marital status, status as a veteran, or sexual orientation and that is circulated in the workplace, or placed anywhere on the workplace premises such as on an employee's desk or workspace or on workplace equipment (including a computer) or bulletin boards.

It is the responsibility of each individual employee to refrain from illegal harassment and it is the right of each individual employee to work in an environment free from harassment.

No staff member may be subjected to any form of retaliation for seeking information on illegal harassment, making a charge, filing a sexual harassment complaint, or testifying, assisting, or participating in an investigation, proceeding, or hearing involving a complaint of illegal harassment.

Any retaliatory action will be a violation of this policy. Supervisors must ensure that no retaliation will result against an employee making a discrimination or illegal harassment complaint.

Accusations of illegal harassment are egregious and can have far-reaching effects on the careers and lives of accused individuals. A false or frivolous charge of discrimination or unlawful harassment is a severe offense that can itself result in disciplinary action. Allegations of illegal harassment must be made in good faith and not out of malice. False and frivolous charges refer to cases where the complainant has filed a complaint based on false accusations for some gain other than to stop discrimination or illegal harassment.

Supervisors are charged with maintaining an atmosphere that discourages illegal harassment and ensuring that this policy is enforced in their area. Supervisors are directed to discourage all behavior that might be considered illegal harassment and to respond promptly to illegal harassment complaints. Supervisors who knowingly condone incidents of illegal harassment or instances of related retaliation will be subject to disciplinary action.

Any employee who feels that he or she has been illegally harassed, or who knows of or suspects the occurrence of discrimination or prohibited harassment, or who desires counseling regarding potential discrimination or illegal harassment, is strongly urged and encouraged to contact his/her immediate supervisor. If the employee feels comfortable, the employee should deal with the incident(s) as directly and firmly as possible by clearly communicating to the offending individual that the behavior is unwelcome and unacceptable.

Each case will be thoroughly investigated to determine whether discrimination or prohibited harassment has occurred. All investigations will be conducted in a manner that protects the privacy of and minimizes suspicion toward all individuals involved. An employee may make a complaint even if the discrimination or illegal harassment is not directed at the person making the complaint.

Any employee found to have violated these policies of discrimination or illegal harassment, or who is found to have retaliated against another employee who in good faith has complained of discrimination or illegal harassment, will be subject to disciplinary action, up to and including termination of employment. An employee who has been discriminated against or illegally harassed while on the job may also have grounds to file a civil or criminal lawsuit.

B. Complaint Procedure for Filing Charges of Discrimination or Unlawful Harassment

Employees who observe acts of discrimination or are the subject of discrimination or unlawful harassment should take the following steps:

1. Direct Communication:

If there is unlawful harassing behavior in the workplace, and if the harassed employee feels comfortable, the harassed employee or the employee who observed the harassment should directly and clearly express her/his objection that the conduct is unwelcome and request that the offending behavior stop. The initial message may be verbal. If subsequent messages are required, such messages should be in writing.

2. Documentation:

The employee should record any incident (what was said or done). Policies, practices, and procedures are nondiscriminatory when they do not cause an individual or group to be treated less favorably in the terms and conditions of their employment compared to other individuals or groups because of such factors as race, color, religion, national origin, ancestry, sex, pregnancy, age, physical or mental disability, marital status, past and present status as a member of the military, or sexual orientation.

3. Contact with Supervisory Personnel:

At the same time direct communication is undertaken, or in the event the employee feels threatened or intimidated by the situation, the problem must be promptly reported to the employee's immediate supervisor. If the harasser is the supervisor, the problem should be reported to the Executive Director.

4. Formal Written Complaint:

An employee must submit a formal written complaint regarding incidents of unlawful harassment within 20 working days of such conduct. Such complaints should be forwarded to the complainant's immediate supervisor. If the harasser is the immediate supervisor, the problem should be reported to the Executive Director. When appropriate, the supervisor will counsel the reporting employee and be available to assist with filing a formal complaint.

5. Formal Investigation:

The supervisor will fully investigate the complaint and submit a report to the Executive Director within 20 working days. The report must contain information on the allegation, a summary of the investigation (including any documentation), the recommended results of the investigation, and a recommended course of action. The Executive Director must review and approve any final recommendation and course of action. After the approval, the supervisor will advise the complainant and the alleged harasser of the results of the investigation. Results of the investigation and any recommended course of action must be conveyed within 60 working days of notification of the formal written complaint.

6. If resolution is not satisfactory to the complaining employee, the employee may file a written complaint with the IHLS Board President within thirty (30) working days of the date of the Executive Director's written response. The Personnel Committee of the IHLS Board shall meet with the employee within a reasonable time and shall thereafter issue a final decision.

7. Resolution Outside IHLS:

It is hoped that most discrimination or complaints of illegal harassment or incidents can be resolved within IHLS. However, employees have the right to contact the Illinois Department of Human Rights (IDHR) or the Equal Employment Opportunity Commission (EEOC) about filing a formal complaint.

An IDHR complaint must be filed within 180 days of the alleged incident(s) (unless it is a continuing offense) in person or in writing by contacting:

Illinois Department of Human Rights
222 S. College Street
Springfield, IL 62704
217-785-5125
800-662-3942
www.state.il.us/dhr

A complaint with the EEOC must be filed within 300 days from the date the employee first finds out about the decision. If an employee is unsure as to whether it is appropriate to file a charge with the EEOC, the EEOC can be contacted electronically. The online assessment can be completed at <https://apps.eeoc.gov/eas/>. An employee can also contact the local EEOC office by telephone, in writing, or in person. The contact information is:

Equal Employment Opportunity Commission
500 West Madison Street, Suite 200,
Chicago, Illinois 60661
Telephone #: 1-800-669-4000; Fax: 312-886-1168
TTY: 1 800 669-6820

Retaliation

Employees who are suddenly transferred to lower paying jobs or passed over for promotions, or feel they have been retaliated against after filing a complaint with IDHR or EEOC, may file a retaliation charge. A retaliation charge is also due within 180 days of the alleged retaliation if it is filed with the Illinois Department of Human Rights, or 300 days of the alleged retaliation if it is filed with the Equal Employment Opportunity Commission.

PROPOSED POLICY:

NON-DISCRIMINATION AND ANTI-HARASSMENT

IHLS is committed to maintaining a workplace that is free of all forms of unlawful discrimination under both the Illinois Human Rights Act (IHRA) and Title VII of the Civil Rights Act of 1964, as amended (Title VII). In keeping with this commitment, IHLS will not tolerate discrimination against or harassment of any of our employees, whether that discrimination or harassment is committed by anyone in the course of an employee's performance of work, including, but not limited to, any supervisor, co-worker, vendor, customer, contractor, or visitor of or to IHLS. Violations of this policy by any employee will result in disciplinary action, up to and including immediate discharge.

Prohibited Discrimination

Discrimination consists of employment actions taken against an individual based on an employee's actual or perceived sex, race, religion, color, national origin, ancestry, physical or mental disability, marital, familial, veteran status, citizenship status, age, pregnancy, pregnancy-related conditions, sexual orientation (including gender identity), military or veteran status, order of protection status, or any other status protected by applicable federal, state, or local laws. IHLS is dedicated to the fulfillment of this policy in regard to all aspects of the employment relationship, including, but not limited to: recruiting, hiring, placement, transfer, training, promotion, rates of pay and other compensation, and all other terms, conditions, and privileges of employment. IHLS will conduct a prompt, thorough investigation of all allegations of discrimination or any violation of its Non-Discrimination and Anti-Harassment Policy in as confidential a manner as possible to take appropriate corrective action, if and where warranted. IHLS prohibits retaliation against any employee who provides information about, complaints, or assists in the investigation of any complaint of discrimination or violation of its Non-Discrimination and Anti-Harassment Policy.

We are all responsible for upholding the IHLS Non-Discrimination and Anti-Harassment Policy, and any claimed violations of that policy should be brought to the attention of anyone in management you feel comfortable reporting this to and/or Human Resource personnel.

POLICY AGAINST WORKPLACE HARASSMENT

IHLS has a strict policy against all types of workplace harassment, including sexual harassment and other forms of unlawful workplace harassment based upon an individual's actual or perceived sex, race, religion, color, national origin, ancestry, physical or mental disability, marital, familial, veteran status, citizenship status, age, pregnancy, pregnancy-related conditions, sexual orientation (including gender identity), order of protection status, or any other status protected

by applicable federal, state, or local laws. All forms of harassment of, or by, employees, vendors, visitors, customers, and clients are strictly prohibited and will not be tolerated.

Harassment may include, but is not limited to:

- Offensive or derogatory jokes, comments, slurs, or like written, photographic materials;
- Threatening, intimidating, or unwelcome touching of another person;
- Racial epithets, slurs, negative stereotypes or intimidating acts that are based on a person's protected status;
- Written or graphic material that shows hostility toward a person because of his or her protected status.

SEXUAL HARASSMENT

Sexual harassment is defined under the Illinois Human Rights Act as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature and constitutes sexual harassment when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. The Illinois Human Rights Act defines harassment as unwelcome conduct on the basis of a person's actual or perceived sex, race, color, religion, national origin, ancestry, marital status, familial, or veteran status, citizenship status, age, pregnancy, pregnancy-related conditions, sexual orientation (including gender identity), order of protection status, or unfavorable discharge from the military that has the purpose or effect of substantially interfering with the individual's work performance, or creating an intimidating, hostile, or offensive work environment.

While it is not possible to identify each and every act that constitutes or may constitute sexual harassment, some examples of sexual harassment are provided below: (a) unwelcome requests for sexual favors; (b) lewd or derogatory comments or jokes; (c) comments regarding sexual behavior of the body of another employee; (d) sexual innuendo and other vocal activity such as catcalls or whistles; (e) obscene letters, notes, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual nature; (f) continuing to express sexual interest after being informed that interest is unwelcome; (g) retaliating against an employee for refusing a sexual advance or reporting an incident of possible sexual harassment to IHLS or any government agency; (h) offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and

(i) any unwanted physical touching or assaults, or blocking or impeding movements. Even if two or more individuals are engaging in consensual conduct such as that described above, such conduct could constitute harassment of and/or discrimination against another individual who witnesses or overhears the conduct or statements.

OTHER WORKPLACE HARASSMENT

Other workplace harassment is verbal or physical conduct that insults or shows hostility or aversion towards an individual because of the individual's actual or perceived sex, race, religion, color, national origin, physical or mental disability, marital, familial, veteran status, citizenship status, ancestry, age, pregnancy, pregnancy-related conditions, sexual orientation (including gender identity), or any other status protected by federal, state, or local laws, and that: (1) contributes to or has the effect of creating an intimidating, hostile, or offensive working environment; (2) unreasonably interferes with an individual's work performance; or (3) otherwise adversely affects an individual's employment opportunities.

Again, while it is not possible to list all the circumstances that constitute other forms of workplace harassment, the following are some examples of conduct that may constitute prohibited workplace harassment: (a) the use of disparaging or abusive words or phrases, slurs, negative stereotyping, or threatening, intimidating, or hostile acts that relate to the above protected categories; (b) written or graphic material that insults, stereotypes, or shows aversion or hostility towards an individual or group because of one of the above protected categories and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on IHLS premises, or circulated in the workplace; and (c) the display of symbols, slogans, or items that are associated with hate or intolerance towards any select group.

WE WILL NOT TOLERATE ANY FORM OF UNLAWFUL DISCRIMINATION OR HARASSMENT! Any employee who feels that he or she has witnessed, or been subject to, any form of discrimination or harassment by a co-worker, customer, or anyone else in the course of performing work for IHLS **should immediately** notify management. If you prefer, take your complaint to the Human Resources Department. In any case, if you are not satisfied with how your complaint has been handled, you may go to the Executive Director to have the issue/concern resolved.

OUTSIDE RESOLUTION

The purpose of this policy is to establish prompt, thorough and effective procedures for responding to every complaint and incident so that problems can be identified and remedied internally. However, an individual also has the right to contact outside agencies to report discrimination or harassment and have an investigation completed by such agencies. Employees

may contact the Illinois Department of Human Rights if the employee desires to file a charge or call the Illinois Sexual Harassment and Discrimination Helpline at 1-877-236-7703.

CONTACT INFORMATION

The Illinois Department of Human Rights' website is <https://www2.illinois.gov/dhr> and the email is IDHR.Intake@illinois.gov.

Contact Information for Illinois IDHR and EEOC Offices:

Illinois Department of Human Rights (IDHR)

Chicago: 312-814-6200 or 800-662-3942; TTY: 866-740-3953

- Springfield: 217-785-5100; TTY: 866-740-3953
- Marion: 618-993-7463; TTY: 866-740-3953

Illinois Human Rights Commission (IHRC)

- Chicago: 312-814-6269; TTY: 312-814-4760
- Springfield: 217-785-4350; TTY: 217-557-1500

United States Equal Employment Opportunity Commission (EEOC)

- Chicago: 800-669-4000; TTY: 800-869-8001

RETALIATION

IHLS prohibits retaliation against any employee who provides information about, complains, or assists in the investigation of any complaint of harassment or discrimination. If you have made a report of harassment or participated in a harassment investigation and believe you have been retaliated against in any way, notify Human Resources immediately so that appropriate action can be taken.

We will promptly and thoroughly investigate any claim and take prompt, appropriate, remedial action based upon all of the relevant circumstances. Discipline for violation of this policy may include, but is not limited to, reprimand, suspension, demotion, transfer, and/or discharge. If IHLS determines that harassment or discrimination occurred, corrective action will be taken to effectively end the harassment. As necessary, IHLS may monitor any incident of harassment or discrimination to ensure the inappropriate behavior has stopped. In all cases, IHLS will follow up as necessary to ensure that there is no retaliation for making a complaint or cooperating with an investigation. Retaliation against any employee for making a good faith complaint or report of

discrimination or harassment and/or participating in an investigation will result in disciplinary action, up to and including discharge.

IHLS will provide all employees with annual training on sexual harassment and prevention each calendar year.

NO CURRENT WORKPLACE VIOLENCE POLICY

Reason for update: To keep our employees safe at work and to abide by applicable laws such as VESSA and state Firearm laws.

PROPOSED POLICY:

WORKPLACE VIOLENCE

The safety and security of every IHLS employee is of vital importance to our organization. Therefore, IHLS has adopted a zero-tolerance policy concerning violence in the workplace.

IHLS expressly prohibits any acts or threats of violence by any employee, former employee, or any other person against any IHLS employee in or about IHLS' facilities or elsewhere while engaged in work-related activities at any time. IHLS will not condone any acts or threats of violence against IHLS' employees or members on IHLS' premises at any time or while they are engaged in business with or on behalf of IHLS, on or off IHLS premises.

All employees are responsible for maintaining a workplace that is free from threatening behavior and violence. Accordingly, each employee has a duty to report any threat, instance of harassment or offensive conduct, or violent act or threat observed or experienced during working time or at any IHLS building or property. In addition, any employee who has a reason to believe that a violent act may be committed on the worksite or against an individual related to the business in any way must promptly report that belief or suspicion to Human Resources and their supervisor. Reports of threats of violence or any other violations of this policy will be kept as confidential as possible; however, all such reported violations will be investigated, and all employees must cooperate in such investigations. No employee who in good faith either makes a report or participates in an investigation under this policy will experience retaliation of any kind.

Examples of prohibited conduct include, but are not limited to:

- Threats or acts of violence occurring on IHLS premises, regardless of the relationship between the parties involved in the incident.

- Threats or acts of violence occurring off IHLS premises involving someone who is acting in a capacity of a representative of IHLS.

IHLS is committed:

- To providing a safe and healthful work environment.
- To taking prompt remedial action up to and including immediate termination, against any employee who engages in any threatening behavior or acts of violence or who uses any obscene, abusive, or threatening language or gestures.
- To taking appropriate action when dealing with members, former employees, visitors to IHLS' facilities, or anyone else who engages in such behavior. Such action may include notifying the police or other law enforcement personnel and actively urging the prosecution of violators of this policy to the maximum extent of the law.
- To prohibiting unauthorized firearms or other weapons onto IHLS premises. No IHLS employee shall possess, while on duty, or while in a IHLS vehicle, a firearm, ammunition, fireworks, or any explosive device or weapon likely or capable of causing harm to persons or property, except that employees authorized to carry concealed firearms under state or federal law may carry a concealed firearm on or about his or her person only within his or her vehicle into a IHLS parking area where a firearm or ammunition may be placed if concealed in a case within a locked vehicle or locked container out of plain view within the vehicle in the parking area, in the manner provided by the Firearm Concealed Carry Act, 430 ILCS 66/65(b). An employee may carry a concealed firearm in the immediate area surrounding his or her vehicle within a parking lot area only for the limited purpose of storing or retrieving a firearm within the vehicle's trunk. For purposes of this subsection, "case" includes a glove compartment or console that completely encloses the concealed firearm or ammunition, the trunk of the vehicle, or a firearm carrying box, shipping box, or other container.
- To establishing viable security measures to ensure that IHLS' facilities are safe and secure to the maximum extent possible and to properly handle access to IHLS facilities by the public, off-duty employees, and former employees.

The duties above are in addition to an ***employee immediately phoning 911 in the event an employee believes an immediate threat of harm exists.***

Any employee who displays a tendency to engage in violent, abusive, or threatening behavior, or who otherwise engages in behavior that IHLS, in its sole discretion, deems offensive or inappropriate will be subject to disciplinary action, up to and including discharge.

Any employee who applies or obtains a protective or restraining order which lists IHLS premises as being protected areas should inform Human Resources. IHLS will require the employee to furnish

IHLS with a copy of the order. Employees who are victims of domestic violence, sexual or gender violence or any other crime of violence, or who have family or household members who are subjected to such violence may take a limited period of unpaid leave on the terms and conditions set forth in the IHLS Victims' Economic Security and Safety Act Leave Policy.