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Welcome

WELCOME TO OUR COMPANY!

We're very happy to welcome you to our company. Thank you for joining us! We want you to feel that your employment at Greater Opportunities for Broome and Chenango, Inc. (hereinafter "GOBC") will be mutually beneficial and pleasant.

You have joined an organization that has established an outstanding reputation for quality programs and services. The credit for this goes to every one of our employees. We hope you too, will find satisfaction and take pride in your work here.

HANDBOOK PURPOSE

This Employee Handbook is presented as a matter of information and has been prepared to inform you about GOBC's philosophy, employment practices, policies, the benefits provided to you as a valued employee, as well as the conduct expected from you. While this handbook is not intended to be a book of rules and regulations, it does include some important guidelines that you need to know.

The Employee Handbook is designed to address the parameters of your employment relationship. Specific questions should be directed to your immediate supervisor and the Human Resources Director.

We hope this guide will help you feel comfortable with us. We depend on you – your success as an at-will employee of ours is our success. Please don't hesitate to ask questions. Your manager will gladly answer them. We believe you will enjoy your work and your fellow employees at GOBC. We also believe you will find GOBC to be a good place to work.

EMPLOYMENT-AT-WILL DOCTRINE DISCLAIMER

The personnel policies in this handbook are intended to merely be guidelines. It is not an employment contract and should not be construed as such. Furthermore, no promise, statement or writing made by a supervisor may be interpreted to constitute an employment relationship other than "at- will." Rather, your employment with this non-profit corporation is "at will," terminable by either yourself or the nonprofit corporation at any time without notice, with or without cause, except as otherwise provided by law.

MODIFICATION CLAUSE

The personnel policies in this handbook may be amended, modified or terminated at any time by the nonprofit organization, without the consent or prior knowledge of the employees. Any such modification will be communicated in writing to all employees.

All other personnel policies, whether written or oral, are declared null and void, ceasing to have any effect whatsoever by the publication and dissemination of this handbook. This handbook supersedes all prior personnel policies.

Mission: Greater Opportunities, Inc.

The mission of Greater Opportunities is to educate, advocate, and empower individuals and families to improve the quality of their lives through the development of self-reliance, while promoting a culture of people working together to help themselves, one another, and their community.

VALUES & PRINCIPLES

Clients: GOBC recognizes and respects the needs and concerns of all clientele served through our agency and treats every client with personal dignity. We do this by promoting an environment that is free from discrimination while promoting an environment of self-reliance. GOBC recognizes the strengths that each client possesses and provides the catalyst to help them achieve their personal goals.

Employees: GOBC recognizes, and respects, that the wealth of knowledge and experience of its employees serves as the cornerstone of which an agency is built and strengthened.

Integrity: GOBC is an organization that values full honesty and integrity in all aspects of agency programming, actions, and integration within the community.

Efficiency: GOBC utilizes all available resources, both externally and internally, in the most effective and efficient manner to provide quality and comprehensive services to the community we serve.

History and Organization

GOBC is a private, not for profit, multi-purpose, inter-generational human service agency which emerged from the Kennedy/Johnson “War on Poverty” programs of the 1960’s.

Incorporated in 1965, its initial funding and operational structure was regulated at the federal level under the Economic Opportunities Act of 1964. The Reagan Administration was responsible for replacing the federal Community Services Administration with Community Services Block Grants (CSBG) administered by the states. Nationwide, these block grants have resulted in a network of more than 1,100 local "Community Action Agencies." In New York State, CSBG funds are administered to GOBC under the jurisdiction of the New York Department of State.

As a Community Action Agency, GOBC is charged with:

Goal #1	Helping low-income people become more self-sufficient
Goal #2	Improving the conditions in which low-income people live
Goal #3	Helping low-income people own a stake in their community
Goal #4	Achieving partnerships with supporters and providers of services to low-income people
Goal #5	Increasing GOBC's capacity to achieve results
Goal #6	Helping low-income people, especially vulnerable populations, achieve their potential by strengthening family and other supportive systems

Administration

The agency is Governed by a Board of Directors that must be made up of at least one-third representatives of the low-income sector, one-third elected public officials, and the remaining members are representative of the private sector. The agency's CEO, with support from the Finance and Human Resources Department, carries out the will of the Board of Directors and is responsible for administrative oversight of the various direct service delivery departments.

Programs of Greater Opportunities, Inc.

Head Start/Early Head Start Mission Statement

Greater Opportunities Head Start empowers children and families to reach their fullest potential by providing the best quality education and supportive services in a developmentally appropriate, engaging and nurturing environment.

Vision Statement

The Head Start Program is a program of the United States Department of Health and Human Services that provides comprehensive early childhood education, health, nutrition, and parent involvement services to low-income children and their families. The program's services and resources are designed to foster stable family relationships, enhance children's physical and emotional well-being, and establish an environment to develop strong school-readiness skills.

The Greater Opportunities Head Start is a high-quality program with well-trained, professional staff meeting the needs of our changing population. Programming is offered through either a center base or home base design. Parents are actively involved in all aspects of the program. Both program models provide a planned, organized and consistently implemented curriculum to support child development and education following the Head Start National Performance Standards.

Activities for children are designed to build their social, cognitive, language and physical development. Staff use a variety of teaching strategies to enhance children's school readiness skills. They are exposed to new experiences, ideas and challenges. The program is inclusive of all children, including those with identified disabilities and developmental needs.
Greater Opportunities Head Start will provide enriched comprehensive services including early childhood, school readiness, parent and adult education, employability, mental health support, health and nutrition services, occupational, physical and speech therapy, literacy, pre-natal and infant through school age care programs through collaboration and networking with community partners.

Greater Opportunities Early Head Start (currently only offered in Chenango County) is a federally funded and locally operated program for pregnant women and children ages birth to three. Activities are planned that encourage parents to observe and celebrate the developmental growth of their child. Early Head Start believes that children are natural learners, and parents are their first teachers. By working together, parents and Early Head Start staff can provide activities and other experiences that encourage the natural development of each child including school-readiness skills.

Each Center may provide:

- Full-day Head Start and/or Early Head Start classrooms
- Integrated special education classrooms
- Collaborative Universal Pre-K classrooms
- Full day/full year child care
- Intergenerational programming
- School age programs
- Child care collaborations
- Satellite services: (i.e., HEAP, DSS, etc.)

Emergency Assistance Programs

The Emergency Assistance Programs currently offered at GOBC include mass food distributions in coordination with the Food Bank of the Southern Tier. GOBC collaborates with the Food Bank of the Sothern Tier to distribute food to individuals/families in our community. GOBC staff and volunteers distribute food at designated times throughout the year at various locations throughout Broome County.

Housing Programs

Broome County

GOBC owns and manages over one hundred and fifty units of safe, affordable housing to low-income residents and those experiencing homelessness in our community. GOBC provides supportive services to individuals and families that are currently residing in our Supportive Housing Program. GOBC also owns and operates a thirty-two-unit senior living complex funded by NYS HCR. In conjunction with the Department of Housing and Urban Development (HUD), GOBC provides supportive housing services to thirty-six chronically homeless individuals with documented disabilities through the Shelter Plus Care Program. In addition, GOBC currently receives funding through the Office of Temporary and Disability Assistance (OTDA) for the New York State Supportive Housing Program (NYSSHP) and the Empire State Supportive Housing Initiative (ESSHI), which provides funding for three Intensive Housing Family Advocates to provide support services for chronically homeless adults, veterans experiencing homelessness, and families receiving TANF. In addition, GOBC operates a Rapid Re-Housing Program through HUD, which provides short-term rental subsidies for individuals and families experiencing homelessness in six counties. The goal for GOBC Housing Advocates is to provide assistance for individuals living in poverty to obtain and maintain healthy interdependence with the rest of the community. Our service plans focus on the strengths of each person and work to empower them and involve them in the decisions and processes that affect their future. Services include case management, life skills education and training, and employment skills training. Using a holistic approach, the Housing Family Advocates strive, through collaboration between service providers, to address the multi-faceted issues of social service customers.

Chenango County

Section 8 Housing Choice Voucher Program: This program offers rental assistance to eligible low to moderate income families and individuals that want to reside in Chenango County to assist them in obtaining safe and affordable housing. The program provides for monthly rental subsidies based on the family size and income. Rental units for the HCV program must meet HUD housing quality standards for the occupant’s health and safety.

Shelter Plus Care Program: The Shelter Plus Care Program is a HUD sponsored subsidy program for individuals and families that are chronically homeless with a documented disability. All referrals for the program are generated through the NY-511 Continuum of Care Coordinated Entry System. This is permanent supportive housing that provides supportive case management, as well as rental subsidies.

First Time Homebuyer Programs: The first step on the road to home ownership is to attend our nationally accredited Homebuyer Education Class. Whether taught by GOBC’s NeighborWorks® America certified instructors or attending an on-line course from the comfort of your home, these classes will teach you everything you need to become a successful homeowner. After completion, you will be well-prepared for the home buying process.

HUD Counseling Services: Greater Opportunities is a certified HUD Counseling Agency. Customers of all income levels are encouraged to talk to a counselor when they are in need of information regarding: Homelessness, rental assistance (having a hard time finding a place to live, rental arrears, landlord problems), fair housing issues, mortgage delinquency or facing foreclosure, predatory lending, refinancing, home repairs, first-time home buying education or reverse mortgages

Down Payment and Closing Cost Assistance: Depending on current the availability of current grant funding, there may be a variety of grants available to assist with down payment and closing cost assistance associated with the purchase of a home, including funding availability for rehabilitation associated with health and safety concerns on the purchase of your first home. Eligibility varies based on the grant for which you are submitting an application.

Revolving Loan Funds and Loan Packaging: Low-interest loans for down payments, closing costs, repairs, and help securing USDA loans for purchases/repairs.

Housing Rehabilitation Programs: GOBC currently has funding programs available to meet the needs of low- to middle-income home owners with a focus on high-priority items such as wells, septic systems, electrical, heating and structural repairs. Depending on the type of repairs, eligibility, and fund availability, a home owner could receive a grant for up to 100% of the project cost. The program assists low-income people with a focus on the elderly, persons with disabilities, and families with children.

Energy Services/Empower: This program is sponsored by NYSERDA and is available to NYSEG or NIMO customers in single family homes and 1-4 family rental units that meet the income guidelines. Upon completion of an application and approval from Empower, NY, a referral is sent to the Energy Services team to perform an electric reduction or home performance audit on the customer's home. The audit will identify electric reduction or energy saving opportunities and the customer may receive compact fluorescent light bulbs, low-flow showerheads and faucet aerators, and light fixtures.

SECTION 100: EMPLOYMENT POLICIES

101: At-Will Employment

Employment with GOBC is “at-will”, and the employee is free to resign at any time. Similarly, GOBC may terminate the employment relationship at any time, with or without cause or notice, so long as there is no violation of applicable federal or state law.

Any hiring is presumed to be “at-will”: that is, the employer is free to discharge an employee, and the employee is equally free to quit, strike, or otherwise cease work.

You are not hired for any definite or specified period of time, even though your wages are paid regularly. There have been no implied or verbal agreements or promises to you that you will be discharged only under certain circumstances or after certain procedures are followed. There is no implied employment contract created by this Handbook or any other GOBC document or written or verbal statement or policy.

102: Equal Employment Opportunity

It is the established policy of GOBC to provide equal employment opportunities to all qualified persons and to administer all aspects and conditions of employment without regard to race, religion, color, sex, gender, sexual orientation, pregnancy, age, national origin, ancestry, physical or mental disability, medical condition, pregnancy-related status, family or marital status, ethnicity, alienage, military status, genetic predisposition or carrier status, or based upon reproductive health decisions, or any other protected classification, in accordance with applicable federal, state, and local laws. GOBC takes allegations of discrimination, harassment, and retaliation very seriously and will promptly conduct an investigation of such complaints.

Equal employment opportunity includes, but is not limited to, employment, promotion, demotion, transfer, leaves of absence, and termination.

GOBC is committed to the principle that employees and applicants for employment are afforded equal employment opportunities without discrimination in recruitment, employment, job assignment, promotion, upgrading, demotion, transfer, layoff, termination, rates of pay or other forms of compensation.

103: Americans with Disabilities Act (“ADA”)

Disability under the ADA is defined as a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having such impairment. New York State law also affords protections to applicants and employees with a disability. The determination of whether any particular condition is considered a disability is made on a case-by-case basis.

The ADA and New York State law prohibit discrimination against people with disabilities in employment, transportation, public accommodation, communications, and governmental activities.

GOBC is committed to complying with the ADA, New York State law, and local law in ensuring equal opportunity in employment for qualified persons with disabilities. All employment practices and activities are conducted on a non-discriminatory basis. GOBC is also committed to not discriminating against any qualified employees or applicants because they are related to or associated with a person with a disability. The required EEO poster will be posted in a conspicuous area for all employees to read.

GOBC will follow state or local law that provides individuals with disabilities greater protection than the ADA. GOBC is committed to taking all action necessary to ensure equal employment opportunities for persons with disabilities in accordance with the ADA and all other applicable federal, state, and local laws.

GOBC protects qualified applicants and employees with disabilities from discrimination in hiring, promotion, discharge, pay, job training, fringe benefits, classification, referral and other aspects of employment on the basis of disability.

For known limitations of qualified individual applicants or employees with disabilities, reasonable accommodation will be provided, except where the accommodation would impose an undue hardship on operations at GOBC.

103a: Religious Observation

GOBC will make reasonable accommodations for religious observation for all employees as required by law. Any such request by an employee shall be made to the employee's supervisor with as much advance notice as possible. Requests will be determined based upon all circumstances presented, specifically whether the request presents an undue hardship to GOBC or its clients.

103b: Reproductive Health Protections

GOBC does not discriminate or retaliate against any employee based upon reproductive health decisions made by an employee or an employee's dependent. GOBC will not access an employee's personal information regarding the employee's or the employee's dependent's reproductive health decision-making, including but not limited to, the decision to use or access a particular drug, device or medical service without the employee's prior informed affirmative written consent. All medical records pertaining to reproductive health are and will remain confidential.

104: Whistleblower Protection – Board Approved: 12/22/2021

EMPLOYEE PROTECTION (WHISTLEBLOWER) POLICY

It is the intent of GOBC to adhere to all laws and regulations that apply to the organization, and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations. If any employee reasonably believes that some policy, practice, or activity of GOBC is in bona-fide violation of law, a written complaint must be filed by that employee with the CEO. An employee shall be protected from retaliation only if the employee brings the alleged bona-fide unlawful activity, policy, or practice to the attention of GOBC, and provides GOBC with a reasonable opportunity to investigate and correct the alleged unlawful activity. The protection described below is only available to employees that comply with this requirement. Beginning January 2022, employees and independent contractors will be protected for reporting employer activity that they reasonably believe violates *any* law, regardless of whether the law relates to public safety or whether the activity was an actual violation.

GOBC will not retaliate against an employee, former employee and/or independent contractor who, in good faith, has made a protest or raised a complaint against some policy, practice or activity of GOBC, or of another individual or entity with whom the corporation has a business relationship, on the basis of a bona-fide reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

GOBC will not retaliate against employee, former employee and/or independent contractor who disclose to a supervisor and a public enforcement body any activity, policy, or practice of GOBC that the employee reasonably believes is a bona-fide violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment. Employers may not take action that would harm a former employee's current or future employment, such as "blackballing" within an industry; or report or threaten to report the immigration status of the employee or the employee's family member.

Notwithstanding the above, it is the clear preference of GOBC that an employee, former employee and/or independent contractor who believes that some policy, practice or activity of GOBC is in violation of the law attempt to resolve the concern internally with GOBC prior to disclosing his/her allegations to, or raising or filing any complaints with any external public body or official. Under the existing law, employees must first notify their employer of the alleged violation before reporting it to a public body. Under the revised law, an employee will only have to make a “good faith effort” to notify the employer, and that’s only if no exception applies. The employee will <u>not</u> have to make a good faith effort to notify the employer if the employee reasonably believes that there is: imminent danger to public safety; if the employee reasonably suspects that the employer will destroy evidence; if the employee reasonably believes physical harm would result; or if the employee reasonably believes the employer is already aware of the activity and will not correct it.

Notwithstanding the above, no concerned employee, former employee and/or independent contractor, or whistleblower, should expect protection under this policy if he/she knowingly initiates, facilitates, supports, conceals, or is otherwise complicit in, the illegal policy, practice or activity that is the subject of his/her disclosure, protest or complaint, unless his/her complicity is, itself, prompted by duress or is motivated by reasonable fear of some form of retaliation.

This policy does not protect any employee, former employee and/or independent contractor acting in bad faith or under a mere suspicion; who is deliberately dishonest; or, has personally garnered financial profit, or some other advantage, to which he/she is not legally entitled.

As such, a concerned employee, former employee and/or independent contractor, or whistleblower, disclosing, protesting or complaining about an allegedly illegal policy, practice or activity, or another employee that is complicit in any such policy, practice or activity, should have no expectation of protection under this policy if his/her actions in raising his/her concerns are in bad faith, mere suspicion, deliberately dishonest, or intended to garner financial profit, or some other advantage, to which he/she is not legally entitled. Employees will be protected if they disclose or threaten to disclose to a supervisor or public body an activity, policy or practice that the employee *reasonably believes* (1) violates a law, rule or regulation; ***<u>or</u>*** (2) poses a substantial and specific danger to public health and safety. In the case of the former, the employee will not have to establish that the employer actually violated a law; the employee’s reasonable belief is enough. Employees will also be protected for disclosing an employer activity that presents a danger to public safety, even if that activity is not unlawful.

For the purposes of this policy, bona-fide shall mean, in addition to its vernacular definition, that the employee, former employee and/or independent contractor has some actual evidence rather than a mere suspicion that the policy, practice or activity is an actual violation of a law or a regulation of a public enforcement body.

It is the responsibility of all directors, officers and employees to comply with all laws and regulations that apply to GOBC and to report violations or suspected violations in accordance with the Whistleblower Policy. Under this policy, it is a disciplinary issue for an employee to know of ethical misconduct and stay silent.

Although it is impossible to describe all conduct that is addressed, this policy specifically requires the following:

1. Dedication to GOBC's mission, vision, and core values and recognition the chief function of GOBC at all times is to serve the best interests of our constituency.
2. The responsible and prudent management of GOBC's funds and assets.
3. Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
4. Compliance with all applicable governmental laws, rules and regulations.
5. Treatment of all persons with respect, equity, and fairness regardless of race, religion, gender, ability, age or national origin.
6. Respect and protection of confidential and/or privileged information to which we have access in the course of our duties.
7. Prompt internal reporting of Code violations to an appropriate person or persons within the organization.
8. Personal accountability for adherence to this Code of Conduct.

The person receiving this type of information should make a written record of all such reports and perform or facilitate an investigation of all credible allegations.

At all times, the privacy and reputation of individuals involved will be respected. There will be no punishment or retaliation for reporting circumstances described in this policy.

CODE OF CONDUCT & PLEDGE OF ETHICS FOR STAFF

Policies

- Be aware of and fully abide by the by-laws and policies, both personnel and otherwise, of GOBC.
- Ensure compliance of GOBC with all laws, regulations and contractual requirements.
- Ensure your compliance, and the compliance of your respective program of GOBC with all personnel policies, personnel practices, laws, regulations and contractual requirements.
- Respect, follow and fully support the duly made decisions of the CEO and your immediate supervisor.
- Respect the work and recommendations of your fellow employees.
- Work diligently to ensure that your job duties are completed to the best of your ability.
- View and act towards the CEO as the chief administrative officer with the sole responsibility for the day-to-day management of the organization.

Informed Participation

- Keep well-informed of all matters pertinent to your employment relationship.
- Respect and follow the “chain of command” of the corporation.
- Act in ways which do not interfere with the duties of the CEO and your immediate supervisor or do not undermine his/her authority with staff members.

Interpersonal

- Maintain open communication and an effective partnership with the CEO and your immediate supervisor.
- Listen carefully to, follow and respect the opinions of the CEO and your immediate supervisor.
- Be “solution focused,” offering criticism in a constructive manner.
- Always work to develop and improve your knowledge and skills as an employee.

105: Immigration Law Compliance

All individuals hired by GOBC will be required to establish and certify their identity and right to work in the United States. Each individual employed by GOBC will be required to produce, within three (3) days, proof of his/her identity and eligibility to work in the United States. Each individual hired by GOBC will be required to certify on the appropriate I-9 form his/her identity and right to work in the United States.
GOBC is committed to employing only United States citizens and aliens who are authorized to work in the United States. GOBC will not unlawfully discriminate on the basis of citizenship or national origin.

106: Drug-Free Workplace

GOBC will comply with the Drug-Free Workplace Act of 1988, to maintain a workplace that is free from the effects of drugs and alcohol abuse, and to protect the safety, health, and well-being of all employees and other individuals in our workplace and community.

Smoking of tobacco products is prohibited inside all areas of the office suite. Public Health Law, Article 13-E, prohibits the smoking of tobacco (i.e., cigarettes, cigars, pipe, vaping or any other matter or substance containing tobacco) Employees may smoke off of GO property only and are responsible for keeping smoking areas clean and free of smoking debris.

GOBC has a zero-tolerance policy regarding drugs/alcohol in the workplace.

All offers of employment will be conditioned on the applicant submitting to and successfully completing and passing a drug and alcohol test.

A. Prohibited Behavior: GOBC prohibits the unlawful use, sale, manufacture, distribution, dispensing, and possession of a controlled substance or illegal drugs, narcotics, or alcoholic beverages on GOBC premises or worksites.

   It is a violation of GOBC policy to be under the influence of alcohol at any time while on or using company property, conducting company business, or otherwise representing GOBC. If a supervisor has a reasonable suspicion an employee is under the influence at the workplace, the employee will be sent immediately for drug and/or alcohol testing. The moderate use of alcohol at GOBC approved meetings, with business meals, travel, entertainment, or in an appropriate social setting, is not prohibited by this policy.

B. Applicability: This Drug-Free Workplace is intended to apply whenever anyone is representing or conducting business for GOBC. Therefore, this policy is in effect during all work hours, while on call, paid standby, whenever conducting business or representing the organization.

C. Testing: An employee may be required to submit to an alcohol/drug test when any of the following occur: a report of on-the-job use or reasonable suspicion that an employee's behavior, performance, error in judgment, accident or incident, or unsafe actions are related to alcohol/controlled substance use. It will be a condition of continued employment for the employee to submit to an alcohol/drug test at the CEO's (or designee authorized to act in his/her absence) determination. Supervisors are required to immediately report to their Director and the HR Director any cause for suspicion or investigation.

   All employees are subject to random drug/alcohol testing in order to prevent and detect substance abuse.

   If the drug test results come back positive or diluted positive, then the employee will be terminated. If the test comes back diluted negative, then the employee may be retested to confirm a negative or positive result.

D. Violations: Any prohibited action under this policy may subject an employee to, but shall not be limited to, the following disciplinary actions:

   a. Illegal Drug Use: Any employee's workplace use, possession on self or personal property (i.e., Vehicle), sale of illegal drugs or substances at any time may result in termination. An employee testing positive in an initial drug screen will not be hired for a position at GOBC.
   b. Alcohol Abuse: An employee shall be determined to be under the influence of alcohol at the workplace if his/her normal faculties are apparently impaired due to consumption of alcohol or if the employee has a blood alcohol level of 0.04 percent (40MG/DL blood) or higher.

E. Disciplinary Actions: The CEO shall have sole discretion in deciding the imposition of penalties, time periods, and conditions of any disciplinary action for an employee who has violated the provision of this policy.

F. Consequences: One of the goals of our drug-free workplace program is to encourage employees to voluntarily seek help with alcohol and/or drug problems. If, however, an individual violates the policy, the consequences are serious.

Any alleged violation will be investigated promptly, impartially and discreetly by the Department Director, HR Director, and CEO. Employees who violate the Drug-Free Workplace Policy will be subject to appropriate disciplinary action up to and including termination from employment.

An employee required by GOBC to enter rehabilitation that fails to successfully complete it and/or violates the policy will be terminated. Nothing in this policy prohibits the employee from being discharged for other violations and/or performance problems.

G. Assistance: GOBC recognizes that alcohol and drug abuse and addiction are treatable illnesses. We also realize that early intervention and support improve the success of rehabilitation. To support employees, GOBC:

- Encourages employees to seek help if they are concerned that they or their family members may have a drug and/or alcohol problem.
- Encourages employees to utilize the services of qualified professionals in the community to assess the seriousness of suspected drug or alcohol problems and identify appropriate sources of help.
- Allows the use of accrued paid leave while seeking treatment for alcohol and other drug problems.
- Offers all employees and their family member's assistance with alcohol and drug problems through the Employee Assistance Program (EAP).

Cross Reference Section 515: Employee Assistance Program

H. Employee Assistance Program: In establishing a drug-free workplace, GOBC will work with an employee suffering from drug or alcohol abuse so that the employee will receive assistance necessary to overcome dependency. An employee seeking such assistance is encouraged to contact their supervisor and/or HR Director to discuss the situation. Any disclosures made by an employee will be treated as strictly confidential.

The employee's decision to seek assistance will not be used as the basis for disciplinary action nor be used against the employee in any disciplinary proceeding.

I. Confidentiality: All information received by GOBC through the drug-free workplace program is confidential communication. Access to this information is limited to those who have a legitimate need to know in compliance with relevant laws and management policies.

J. Shared Responsibility: A safe and productive drug-free workplace is achieved through cooperation and shared responsibility. Both employees and management have important roles to play.

It is the employee's responsibility to:

- Be concerned about working in a safe environment
- Support fellow workers in seeking help
- Use the Employee Assistance Program
- Report dangerous behavior to their supervisor

It is the supervisor's responsibility to:

- Inform employees of the Drug-Free Workplace policy
- Observe employee performance
- Document negative changes and problems in performance
- Counsel employees as to expected performance improvement
- Investigate, document and report observances or reports of dangerous practices to the Department Director
- Refer employees to the Employee Assistance Program
- Clearly state consequences of policy violations

K. Notification of Conviction for Drug Crime Committed in the Workplace: As a condition of employment, an employee must notify GOBC of any criminal drug statute conviction for a violation occurring in the workplace no later than five (5) days after such conviction. GOBC complies fully with all federal, state and local laws prohibiting unfair discrimination on the basis of criminal arrests and/or convictions.

L. Notification of Convictions to Federal Agency: When required, GOBC will notify the federal contracting agencies within ten (10) days of receiving notice that a covered employee has been convicted of any criminal drug statute for a violation occurring in the workplace.

107: Sexual Harassment Prevention

Greater Opportunities for Broome and Chenango, Inc. is committed to maintaining a workplace free from sexual harassment. Sexual harassment is a form of workplace discrimination.
All employees are required to work in a manner that prevents sexual harassment in the workplace. This Policy is one component of GOBC's commitment to a discrimination-free work environment. Sexual harassment is against the law and all employees have a legal right to a workplace free from sexual harassment and employees are urged to report sexual harassment by filing a complaint internally with the HR Director or CEO. Employees can also file a complaint with a government agency or in court under federal, state or local antidiscrimination laws.

Policy:

1. GOBC's policy applies to all employees, applicants for employment, interns, whether paid or unpaid, contractors and persons conducting business, regardless of immigration status, with GOBC. In the remainder of this document, the term "employees" refers to this collective group.

2. Sexual harassment will not be tolerated. Any employee or individual covered by this policy who engages in sexual harassment or retaliation will be subject to remedial and/or disciplinary action (e.g., counseling, suspension, termination).

3. Retaliation Prohibition: No person covered by this Policy shall be subject to adverse action because the employee reports an incident of sexual harassment, provides information, or otherwise assists in any investigation of a sexual harassment complaint. GOBC will not tolerate such retaliation against anyone who, in good faith, reports or provides information about suspected sexual harassment. Any employee of GOBC who retaliates against anyone involved in a sexual harassment investigation will be subjected to disciplinary action, up to and including termination. All employees, paid or unpaid interns, or non-employees[1] working in the workplace who believe they have been subject to such retaliation should inform a supervisor, manager, or HR Director. All employees, paid or unpaid interns or non-employees who believe they have been a target of such retaliation may also seek relief in other available forums, as explained below in the section on Legal Protections.

4. Sexual harassment is offensive, is a violation of our policies, is unlawful, and may subject GOBC to liability for harm to targets of sexual harassment. Harassers may also be individually subject to liability. Employees of every level, who engage in sexual harassment, including managers and supervisors who engage in sexual harassment or who allow such behavior to continue, will be penalized for such misconduct.

5. GOBC will conduct a prompt and thorough investigation that ensures due process for all parties, whenever management receives a complaint about sexual harassment, or otherwise knows of possible sexual harassment occurring. GOBC will keep the investigation confidential to the extent possible. Effective corrective action will be taken whenever sexual harassment is found to have occurred. All employees, including managers and supervisors, are required to cooperate with any internal investigation of sexual harassment.

All employees are encouraged to report any harassment or behaviors that violate this policy. GOBC will provide all employees a complaint form.

6. Managers and supervisors are **required** to report any complaint that they receive, or any harassment that they observe or become aware of, to the HR Director or CEO.
7. This policy applies to all employees, paid or unpaid interns, and non-employees and all must follow and uphold this policy. This policy must be provided to all employees and should be posted prominently in all work locations to the extent practicable (for example, in a main office, not an offsite work location) and be provided to employees upon hiring.

What Is "Sexual Harassment"?

Sexual harassment is a form of sex discrimination and is unlawful under federal, state, and (where applicable) local law. Sexual harassment includes harassment on the basis of sex, sexual orientation, self-identified or perceived sex, gender expression, gender identity and the status of being transgender.

Sexual harassment includes unwelcome conduct which is either of a sexual nature, or which is directed at an individual because of that individual's sex when:

- 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, even if the reporting individual is not the intended target of the sexual harassment;
- Such conduct is made either explicitly or implicitly a term or condition of employment; or
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting an individual's employment.

A sexually harassing hostile work environment includes, but is not limited to, words, signs, jokes, pranks, intimidation or physical violence which are of a sexual nature, or which are directed at an individual because of that individual's sex. Sexual harassment also consists of any unwanted verbal or physical advances, sexually explicit derogatory statements or sexually discriminatory remarks made by someone which are offensive or objectionable to the recipient, which cause the recipient discomfort or humiliation, which interfere with the recipient's job performance.

Sexual harassment also occurs when a person in authority tries to trade job benefits for sexual favors. This can include hiring, promotion, continued employment or any other terms, conditions or privileges of employment. This is also called "quid pro quo" harassment.
Any employee who feels harassed should report so that any violation of this policy can be corrected promptly. Any harassing conduct, even a single incident, can be addressed under this policy.

Examples of sexual harassment

The following describes some of the types of acts that may be unlawful sexual harassment and that are strictly prohibited:

- Physical acts of a sexual nature, such as:
  - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another employee's body or poking another employee's body;
  - Rape, sexual battery, molestation or attempts to commit these assaults.
- Unwanted sexual advances or propositions, such as:
  - Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments;
  - Subtle or obvious pressure for unwelcome sexual activities.
- Sexually oriented gestures, noises, remarks or jokes, or comments about a person's sexuality or sexual experience, which create a hostile work environment.
- Sex stereotyping occurs when conduct or personality traits are considered inappropriate simply because they may not conform to other people's ideas or perceptions about how individuals of a particular sex should act or look.
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
  - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
  - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
  - Sabotaging an individual's work;

- Bullying, yelling, name-calling.

Who can be a target of sexual harassment?

Sexual harassment can occur between any individuals, regardless of their sex or gender. New York Law protects employees, paid or unpaid interns, and non-employees, including independent contractors, and those employed by companies contracting to provide services in the workplace. Harassers can be a superior, a subordinate, a coworker or anyone in the workplace including an independent contractor, contract worker, vendor, client, customer or visitor.

Where can sexual harassment occur?

Unlawful sexual harassment is not limited to the physical workplace itself. It can occur while employees are traveling for business or at employer sponsored events or parties. Calls, texts, emails, and social media usage by employees can constitute unlawful workplace harassment, even if they occur away from the workplace premises, on personal devices or during non-work hours.

Retaliation

Unlawful retaliation can be any action that could discourage a worker from coming forward to make or support a sexual harassment claim. Adverse action need not be job-related or occur in the workplace to constitute unlawful retaliation (e.g., threats of physical violence outside of work hours).
Such retaliation is unlawful under federal, state, and (where applicable) local law. The New York State Human Rights Law protects any individual who has engaged in "protected activity." Protected activity occurs when a person has:

- made a complaint of sexual harassment, either internally or with any anti-discrimination agency;
- testified or assisted in a proceeding involving sexual harassment under the Human Rights Law or other anti-discrimination law;
- opposed sexual harassment by making a verbal or informal complaint to management, or by simply informing a supervisor or manager of harassment;
- reported that another employee has been sexually harassed; or
- encouraged a fellow employee to report harassment.

Even if the alleged harassment does not turn out to rise to the level of a violation of law, the individual is protected from retaliation if the person had a good faith belief that the practices were unlawful. However, the retaliation provision is not intended to protect persons making intentionally false charges of harassment.

Reporting Sexual Harassment

Preventing sexual harassment is everyone's responsibility. GOBC cannot prevent or remedy sexual harassment unless it knows about it. Any employee, paid or unpaid intern or non-employee who has been subjected to behavior that may constitute sexual harassment is encouraged to report such behavior to a supervisor, manager or HR Director. Anyone who witnesses or becomes aware of potential instances of sexual harassment should report such behavior to a supervisor, manager, HR Director or CEO.

Reports of sexual harassment may be made verbally or in writing. A form for submission of a written complaint is attached to this Policy, and all employees are encouraged to use this complaint form. Employees who are reporting sexual harassment on behalf of other employees should use the complaint form and note that it is on another employee's behalf.

Employees, paid or unpaid interns or non-employees who believe they have been a target of sexual harassment may also seek assistance in other available forums, as explained below in the section on Legal Protections.

Supervisory Responsibilities

All supervisors and managers who receive a complaint or information about suspected sexual harassment, observe what may be sexually harassing behavior or for any reason suspect that sexual harassment is occurring, are **required** to report such suspected sexual harassment to the HR Director or CEO.

In addition to being subject to discipline if they engaged in sexually harassing conduct themselves, supervisors and managers will be subject to discipline for failing to report suspected sexual harassment or otherwise knowingly allowing sexual harassment to continue.
Supervisors and managers will also be subject to discipline for engaging in any retaliation.

Complaint and Investigation of Sexual Harassment

All complaints or information about sexual harassment will be investigated, whether that information was reported in verbal or written form. Investigations will be conducted in a timely manner, and will be confidential to the extent possible.

An investigation of any complaint, information or knowledge of suspected sexual harassment will be prompt and thorough, commenced immediately and completed as soon as possible. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses and alleged harassers will be accorded due process, as outlined below, to protect their rights to a fair and impartial investigation.

Any employee may be required to cooperate as needed in an investigation of suspected sexual harassment. GOBC will not tolerate retaliation against employees who file complaints, support another's complaint or participate in an investigation regarding a violation of this policy.

While the process may vary from case to case, investigations should be done in accordance with the following steps:

- Upon receipt of complaint the HR Director will conduct an immediate review of the allegations, and take any interim actions (e.g., instructing the respondent to refrain from communications with the complainant), as appropriate. If complaint is verbal, encourage the individual to complete the "Complaint Form" in writing. If he or she refuses, prepare a Complaint Form based on the verbal reporting.

- If documents, emails or phone records are relevant to the investigation, take steps to obtain and preserve them.

- Request and review all relevant documents, including all electronic communications.

- Interview all parties involved, including any relevant witnesses;
- Create a written documentation of the investigation (such as a letter, memo or email), which contains the following:
    - A list of all documents reviewed, along with a detailed summary of relevant documents;
    - A list of names of those interviewed, along with a detailed summary of their statements;
    - A timeline of events;
    - A summary of prior relevant incidents, reported or unreported; and

    - The basis for the decision and final resolution of the complaint, together with any corrective action(s).

- Keep the written documentation and associated documents in a secure and confidential location.

- Promptly notify the individual who reported and the individual(s) about whom the complaint was made of the final determination and implement any corrective actions identified in the written document.

- Inform the individual who reported of the right to file a complaint or charge externally as outlined in the next section.

Legal Protections and External Remedies

Sexual harassment is not only prohibited by GOBC but is also prohibited by state, federal, and, where applicable, local law.

Aside from the internal process at GOBC, employees may also choose to pursue legal remedies with the following governmental entities. While a private attorney is not required to file a complaint with a governmental agency, you may seek the legal advice of an attorney.

In addition to those outlined below, employees in certain industries may have additional legal protections.

State Human Rights Law (HRL)

The Human Rights Law (HRL), codified as N.Y. Executive Law, art. 15, § 290 et seq., applies to all employers in New York State with regard to sexual harassment, and protects employees, paid or unpaid interns and non-employees, regardless of immigration status. A complaint alleging violation of the Human Rights Law may be filed either with the Division of Human Rights (DHR) or in New York State Supreme Court.
Complaints with DHR may be filed any time **within one year** of the harassment. If an individual did not file at DHR, they can sue directly in state court under the HRL, **within three years** of the alleged sexual harassment. An individual may not file with DHR if they have already filed an HRL complaint in state court.

Complaining internally to GOBC does not extend your time to file with DHR or in court. The one year or three years is counted from date of the most recent incident of harassment.

You do not need an attorney to file a complaint with DHR, and there is no cost to file with DHR.

DHR will investigate your complaint and determine whether there is probable cause to believe that sexual harassment has occurred. Probable cause cases are forwarded to a public hearing before an administrative law judge. If sexual harassment is found after a hearing, DHR has the power to award relief, which varies but may include requiring your employer to take action to stop the harassment, or redress the damage caused, including paying of monetary damages, attorney's fees and civil fines.

DHR's main office contact information is: NYS Division of Human Rights, One Fordham Plaza, Fourth Floor, Bronx, New York 10458. You may call (718) 741-8400 or visit: www.dhr.ny.gov.

Contact DHR at (888) 392-3644 or visit dhr.ny.gov/complaint for more information about filing a complaint. The website has a complaint form that can be downloaded, filled out, notarized and mailed to DHR. The website also contains contact information for DHR's regional offices across New York State.

Civil Rights Act of 1964

The United States Equal Employment Opportunity Commission (EEOC) enforces federal anti-discrimination laws, including Title VII of the 1964 federal Civil Rights Act (codified as 42 U.S.C. § 2000e et seq.). An individual can file a complaint with the EEOC anytime within 300 days from the harassment. There is no cost to file a complaint with the EEOC. The EEOC will investigate the complaint, and determine whether there is reasonable cause to believe that discrimination has occurred, at which point the EEOC will issue a Right to Sue letter permitting the individual to file a complaint in federal court.

The EEOC does not hold hearings or award relief, but may take other action including pursuing cases in federal court on behalf of complaining parties. Federal courts may award remedies if discrimination is found to have occurred. In general, private employers must have at least 15 employees to come within the jurisdiction of the EEOC.

An employee alleging discrimination at work can file a "Charge of Discrimination." The EEOC has district, area, and field offices where complaints can be filed. Contact the EEOC by calling 1-800-669-4000 (TTY: 1-800-669-6820), visiting their website at www.eeoc.gov or via email at info@eeoc.gov.
If an individual filed an administrative complaint with DHR, DHR will file the complaint with the EEOC to preserve the right to proceed in federal court.

Local Protections

Many localities enforce laws protecting individuals from sexual harassment and discrimination. An individual should contact the county, city or town in which they live to find out if such a law exists. For example, employees who work in New York City may file complaints of sexual harassment with the New York City Commission on Human Rights. Contact their main office at Law

Enforcement Bureau of the NYC Commission on Human Rights, 40 Rector Street, 10th Floor, New York, New York; call 311 or (212) 306-7450; or visit www.nyc.gov/html/cchr/html/home/home.shtml.

Contact the Local Police Department

If the harassment involves unwanted physical touching, coerced physical confinement or coerced sex acts, the conduct may constitute a crime. Contact the local police department.

107A: Harassment Prevention

As referred to section 107 Sexual Harassment is against the law. While this policy specifically addresses sexual harassment, harassment because of and discrimination against persons of all protected classes is prohibited. In New York State, such classes include age, race, creed, color, national origin, sexual orientation, military status, sex, disability, marital status, domestic violence victim status, gender identity and criminal history.

A non-employee is someone who is (or is employed by) a contractor, subcontractor, vendor, consultant, or anyone providing services in the workplace. Protected non-employees include persons commonly referred to as independent contractors, “gig” workers and temporary workers. Also included are persons providing equipment repair, cleaning services or any other services provided pursuant to a contract with the employer.

108: Anti-Bullying

In addition to GOBC’s policies of Sexual Harassment Prevention, we believe it necessary to delineate a policy regarding workplace bullying, as such bullying has numerous negative effects on both individual employees and GOBC as a whole. Workplace bullying may cause the loss of trained and talented employees, reduce productivity and morale and create legal risks.

GOBC believes all employees should be able to work in an environment free of bullying. Workplace bullying refers to repeated, unreasonable actions of individuals (or a group) directed towards an employee (or a group of employees), which are intended to intimidate, degrade, humiliate or undermine; or which create a risk to the health or safety of the employee(s). Some examples of workplace bullying include repeated acts such as:

- Unwarranted or invalid criticism
- Blame without factual justification
- Being treated differently than the rest of the employees in a work group
- Being the target of cussing or disrespectful language
- Exclusion or social isolation

- Being the target of shouting or other behavior intended to humiliate the employee
- Excessive “prank” jokes or teasing of an employee

GOBC considers workplace bullying unacceptable and will not tolerate it under any circumstances. Supervisors and managers are to assume the responsibility to ensure employees are not bullied.

Any employee who bullies a co-worker will be subject to disciplinary action, up to and including termination of employment.

GOBC encourages all employees to report workplace bullying to a supervisor or manager with whom the employee is comfortable speaking or directly to his/her supervisor, manager or designee. All complaints of workplace bullying will be treated seriously and investigated promptly. In the investigation process, GOBC will attempt to maintain confidentiality to the fullest extent possible.

It is a violation of GOBC policy to retaliate or otherwise victimize an employee who makes a complaint or a witness who serves in the investigation of the workplace bullying allegation.

109: SOCIAL MEDIA

GOBC has determined that social media is a tool that can be used to further its mission and goals. Social media can provide a cost-effective method of engaging communities in discussion, fostering positive relationships with clients, and representing GOBC in these emerging electronic communications.

At GOBC, we understand that social media can be a fun and rewarding way to share your life and opinions with family, friends and co-workers. However, use of social media also presents certain risks and carries with it certain responsibilities. To assist you in making responsible decisions about your use of social media, we have established these guidelines for appropriate use of social media. This policy applies to all employees who work for GOBC.

GUIDELINES

In the rapidly expanding world of electronic communication, *social media* can mean many things. *Social media* includes all means of communicating or posting information or content of any sort on the Internet, including to your own or someone else’s web log or blog, journal or diary, personal web site, social networking or affinity web site, web bulletin board or a chat room, whether or not associated or affiliated with GOBC, as well as any other form of electronic communication.

The same principles and guidelines found in GOBC policies apply to your activities online. Ultimately, you are solely responsible for what you post online. Before creating online content, consider some of the risks and rewards that are involved. Keep in mind that any of your conduct that adversely affects your job performance, the performance of fellow employees or otherwise adversely affects our clients and associates or GOBC's legitimate business interests may result in disciplinary action up to and including termination.

Know and follow the rules

Carefully read these guidelines, the GOBC Professional Code of Ethics & Standards of Conduct Policy, the GOBC Information Technology & Security Policy and the Sexual Harassment/Harassment Prevention Policy, and ensure your postings are consistent with these policies.

Inappropriate postings that may include discriminatory remarks, harassment, and threats of violence or similar inappropriate or unlawful conduct will not be tolerated and may subject you to disciplinary action up to and including termination.

Be respectful

Always be fair and courteous to fellow employees, clients or people who work on behalf of GOBC. Also, keep in mind that you are more likely to resolve work-related complaints by speaking directly with your co-worker or by utilizing our Open-Door Policy than by posting complaints to a social media outlet. Nevertheless, if you decide to post complaints or criticism, avoid using statements, photographs, video or audio that reasonably could be viewed as malicious, obscene, threatening or intimidating, that disparage fellow employees, associates or clients, or that might constitute harassment or bullying. Examples of such conduct might include offensive posts meant to intentionally harm someone's reputation or posts that could contribute to a hostile work environment on the basis of race, sex, disability, religion or any other status protected by law or company policy.

Be honest and accurate

Make sure you are always honest and accurate when posting information or news, and if you make a mistake, correct it quickly. Be open about any previous posts you have altered. Remember that the Internet archives almost everything; therefore, even deleted postings can be searched. Never post any information or rumors that you know to be false about GOBC, fellow employees, associates, clients or people working on behalf of GOBC.

Post only appropriate and respectful content

- Maintain the confidentiality of GOBC trade secrets and private or confidential information. Trades secrets may include information regarding the development of systems, processes, products, know-how and technology. Do not post internal reports, policies, procedures or other internal business-related confidential communications.
- Do not create a link from your blog, website or other social networking site to a GOBC website without identifying yourself as a GOBC employee.
- Express only your personal opinions. Never represent yourself as a spokesperson for GOBC. If GOBC is a subject of the content you are creating, be clear and open about the fact that you are an employee and make it clear that your views do not represent those of GOBC, fellow employees, associates, clients or people working on behalf of GOBC. If

you do publish a blog or post online related to the work you do or subjects associated with GOBC, make it clear that you are not speaking on behalf of GOBC. It is best to include a disclaimer such as “The postings on this site are my own and do not necessarily reflect the views of GOBC.”

Using social media at work

Refrain from using social media while on work time or on equipment we provide, unless it is work-related as authorized by your manager or consistent with the Company Equipment Policy. Do not use GOBC email addresses to register on social networks, blogs or other online tools utilized for personal use.

Retaliation is prohibited

GOBC prohibits taking negative action against any employee for reporting a possible deviation from this policy or for cooperating in an investigation. Any associate who retaliates against another associate for reporting a possible deviation from this policy or for cooperating in an investigation will be subject to disciplinary action, up to and including termination.

Media contacts

Employees should not speak to the media on GOBC’s behalf without contacting the CEO or HR. All media inquiries should be directed to the CEO.

Protected activity

Nothing in this social media policy is intended to interfere with, restrain, or prevent employee communications regarding wages, hours, or other terms and conditions of employment or to otherwise interfere with employee rights under the National Labor Relations Law. GOBC will not construe this policy in a way that limits such rights. Employees at GOBC should not assume that communications sent by them via GOBC electronic communications are private or confidential and GOBC may need to monitor, access, or review electronic communications systems and its contents for business reasons and GOBC reserves the right to do so.

For more information

If you have questions or need further guidance, please contact your HR representative.

110: Greater Opportunities Property   Updated Policy BOD Approved:

<u>INTERNET USAGE CLAUSE</u>

GOBC has made substantial investments to make it possible for employees to electronically communicate with one another, customers, prospects and suppliers, as well as to seek information from the worldwide web. The purpose of these investments is to help employees do their jobs in a more efficient manner. To that end, this usage policy is designed to define expectations for what is acceptable and what is not when it comes to using these resources wisely. Violation of the prohibitions contained herein may lead to disciplinary action, up to and including termination.

Internet usage is provided to employees as a result of a significant investment on the part of GOBC and it is expected that employees will use this resource for business purposes. Examples of appropriate usage include the following:

- Communicating with fellow employees, customers, prospects and suppliers about work-related manners;
- Researching topics that are relevant to your specific job requirements; and
- Conducting other business activities such as working with the manager who manages the company web site (e.g., posting job opportunities, describing company products, etc.).

Corporate policies, both written and implied, that apply to normal business behavior are applicable to use of the Internet. Such policies include, but are not limited to, the following:

<u>Confidentiality</u>
Issues of confidentiality take on critical importance when it comes to the Internet (see related sections relative to Public Forum below).

The Internet provides heightened level of communication, enabling many corporate employees to make statements on behalf of the agency. When an employee sends an electronic message ("e-mail"), or otherwise communicates through a public forum, as an employee of GOBC, it is natural for the recipient of that message, or communication, to understand it to be an official position or message from GOBC. In fact, it may just be a personal opinion of the individual employee.

Under no circumstances should an employee disseminate confidential information over the Internet to anyone that is not covered by a Confidential Discloser Agreement ("CDA"). Likewise, great care must be taken even when sending confidential information to individuals who are covered by CDA. It is easy for an e-mail to inadvertently be sent to an incorrect address or to contain the wrong attachment files for a given matter. Security and confidentiality need to be extremely high concerns for all employees. When confidential files are sent over the Internet, users must take great care in disseminating them. It is strongly recommended that files be encrypted before file transmissions.

<u>Software Piracy</u>
Access to the Internet enables users to download a wide variety of software products free of charge, as well as for a range of fees. Employees are required to fulfill all license and copyright obligations of software that they download for their personal use.

These software downloads become the property of GOBC. Any employee who knowingly violates this software piracy rule is subject to termination. Prior approval for the CEO or the Program Director is required before any software is installed on GOBC's equipment.

<u>Security</u>

Employees are required to maintain all policies regarding security of company data and resources (see the section on Internet Security below).

Pornography

Employees are not allowed to visit web sites that are considered “obscene.” GOBC may maintain a system to monitor Internet usage. In the event that an employee disregards this policy and visits “unauthorized” sites, it will be grounds for immediate termination. GOBC has the right to view private files that have been downloaded to check for the propriety of said material.

Sexual Harassment

Displaying sexually explicit images on the property of GOBC is a violation of corporate policy concerning workplace harassment. Employees are not allowed to download, archive, edit or manipulate sexually explicit material while using corporate resources.

Illegal Activity

An employee cannot use GOBC’s Internet facilities to knowingly break any laws and regulations of this state, the federal government or the governments of other nations. Use of the internet for illegal purposes will be grounds for termination.

Honest Disclosure

Employees are expected to honestly disclose who they are when they send an e-mail, register accounts or conduct other Internet transactions. Attempting to subvert this disclosure policy is a serious offense.

Excessive Resource Requirements

Employees are reminded to make prudent use of the Internet to avoid any degradation of the overall corporate computing resources. Therefore, it is recommended that employees refrain from excessive downloads that might constrain computing resources.

Public Forum

Employees are allowed to enter a public forum when it makes business sense to do so. Only those employees who are authorized to speak on behalf of GOBC may do so in the name of GOBC in any news group, public forum or chat room. An employee who does not have such authorization may occasionally be permitted to make statements as an individual. In such circumstances, the employee must identify him/herself as an individual when entering the forum. If asked whether certain comments can be construed as a statement of GOBC, the employee can only make an affirmative declaration if he/she is so authorized. All confidentiality matters apply in a public forum.

Private Internet Use

If an employee uses the Internet at home on his/her personal account, the employee’s right to privacy is always assured. However, all confidentiality requirements of GOBC remain in effect (i.e., employees may not make statements on behalf of GOBC unless so authorized). An employee can represent him/herself as an employee, but must ensure that his/her comments are construed as personal opinion. In all situations, an employee must refrain from making statements to rendering opinions that could affect GOBC's valuation, confidentiality or image.

Use of the Internet during Non-Business Hours

The Internet may be used during non-business hours for personal use, although the same review authorization applies.

Internet Access and Administration Clause

GOBC reserves the right to limit access to the Internet for employees at any time, for any legally permissible reason.

GOBC also reserves the right to monitor the usage of the Internet. This includes the following:

- Blocking certain sites that have been deemed offensive. If applicable, attempts to subvert this blocking will be grounds for termination;
- Monitoring the usage rates of the Internet by all employees. GOBC reserves the right to publish such information on an internal basis;
- Monitoring the specific sites that each employee visits and the length of each visit, and;
- Monitoring transfers and e-mail deliveries.

Electronic communications and Internet visits made during business hours by employees are not considered to be private or confidential by GOBC.

"An employee shall be advised that any and all telephone conversations or transmissions, electronic mail or transmissions, or internet access or usage by an employee by any electronic device or system" may be subject to monitoring "at any and all times and by any lawful means."

GOBC reserves the right to inspect files and communications that employees render to assure compliance with this policy. Corporate e-mail addresses are provided to employees for business related communications only. Any personal e-mail should be sent to a private e-mail address maintained by the employee. Nevertheless, personal e-mail addressed to the individual that is retrieved on GOBC's equipment is subject to all restrictions and requirements as if it was addressed to GOBC's e-mail addresses and are reserved for use on subscription and electronic mailing lists that are for GOBC's business purposes only.

INTERNET SECURITY CLAUSE

The Internet provides great benefits but also great risks. GOBC's resources can be severely impaired or damaged when proper procedures are not adhered to.

Passwords

Employees will be assigned passwords and user identifications to access GOBC's network and the Internet. Employees must keep this information confidential. Employees are not permitted to share their individual identifications with other employees.

Viruses, Trojan Horses, etc.
All files that are downloaded must be first scanned for possible infection. Any employee who knowingly tries to propagate the Internet of internal resources with infected viruses or Trojan horses will be subject to termination.

Firewalls, Security Systems
GOBC has installed a variety of systems to thwart intrusion by outside hackers. It is extremely important that these systems' integrity be maintained. Any user who tries to override these security measures will be subject to termination.

Employees may not use, divert, or appropriate GOBC property, equipment, services, or assets for personal use or benefit without prior permission from their supervisor. At no time should an GOBC vehicle be used for personal use.

GOBC retains the right to access and monitor all agency workspace and agency-owned equipment. Employees are responsible for all property, materials, or written information issued to them or in their possession or control.

Employees must return all GOBC property immediately upon request or upon termination of employment. All 10-month Head Start employees are required to return any GOBC property to GOBC at the end of each school year.

Employees will be responsible for the replacement cost of GOBC handbooks, laptops etc.
Any GOBC property not returned or damaged may have the value deducted, consistent with FLSA, from the employee's final paycheck and the employee may be subject to criminal charges 110: Greater Opportunities Property

111: Child Abuse

GOBC will comply with applicable federal and state regulations in the area of child abuse and maltreatment. These laws and regulations will apply to all employees, volunteers, consultants, or anyone who will have the potential of contact with children.

GOBC has a zero tolerance for sexual misconduct perpetrated on children or other vulnerable persons in its care.

CHILD ABUSE AND NEGLECT/VULNERABLE ADULT ABUSE
AND NEGLECT REPORTING POLICY

PURPOSE/POLICY
GOBC must respond to suspected or known child abuse and neglect or child sexual abuse whether it occurs inside or outside of the program. GOBC must respond to suspected or known

vulnerable adult abuse and neglect whether it occurs within or outside of GOBC. Each person within GOBC must report suspected abuse and neglect in accordance with the provisions of applicable state or local law.

PROCEDURES

1. Individuals in GOBC will preserve the confidentiality of all records pertaining to known or suspected child or vulnerable adult abuse or neglect in accordance with applicable state law.

2. No one within GOBC will undertake their own investigation or treat cases of suspected child or vulnerable adult abuse and neglect.

3. Any person in GOBC suspecting child or vulnerable adult abuse or neglect will report it immediately to the Statewide Central Register of Child Abuse and Maltreatment if warranted and their supervisor and/or director.

4. Each person in GOBC will cooperate fully with child protective service agencies, local law enforcement and county social services agencies.

5. GOBC will make every effort to retain in the program children allegedly abused or neglected.

SPECIAL SERVICES COORDINATOR

1. GOBC's Special Services Coordinator or designee is responsible for:

   - Working closely with the employee suspecting child or vulnerable adult abuse or neglect to ensure reporting to the authorities is handled correctly according to state law.
   - Establishing and maintaining cooperative relationships with the agencies providing child protective services and adult social services in the community and with any other organization to which abuse and neglect must be reported under state law, including regular formal and informal communication with staff at all levels of the agencies.
   - Informing parents and staff of what state laws require in cases of suspected child and vulnerable adult abuse and neglect.
   - Knowing what community medical and social services are available for families with an abuse or neglect problem.
   - Reporting instances of suspected child abuse and neglect among Early Head Start/Head Start children reportable under federal (and/or applicable state) law on behalf of the Early Head Start/Head Start program.
   - Discussing the report with the family if it appears desirable or necessary to do so.
   - Informing other staff regarding the process for identifying and reporting suspected child and vulnerable adult abuse and neglect.

2. Training:

- GOBC provides orientation and training, which fosters a helpful rather than a punitive attitude toward abusing or neglecting parents and other caretakers, for staff on the identification and reporting of child abuse and neglect.
- GOBC provides an orientation for parents, which fosters a helpful rather than a punitive attitude toward abusing or neglecting parents and other caretakers, on the need to prevent abuse and neglect and provide protection for abused and neglected children.

112: Violence, Threats, and Weapons

GOBC is committed to a safe and secure workplace for its employees and the public whom we serve. Violence, threats, harassment, intimidation, and other disruptive behavior in our workplace will not be tolerated. Such behavior includes, but is not limited to, oral or written statements, acts, gestures or expressions that communicate a direct or indirect threat of physical harm.

The carrying of guns, other weapons, ammunition, or explosives while on GOBC property or during work hours is prohibited. This prohibition applies to GOBC parking lots, buildings, and any other property GOBC owns, leases, or occupies. In addition, this policy applies to all personnel while on a job site or otherwise employed by GOBC.

It is the responsibility of all department directors and their respective supervisory personnel to ensure that all employees, contractors, vendors, and visitors understand that weapons are not permitted on GOBC property.

It is the responsibility of all employees to immediately report to a supervisor or director all violence, threats, harassment, intimidation, and other disruptive behavior. Threats or assaults that require immediate attention by police should be reported first by calling 911.

Any employee, supervisor, or manager who is found to have violated the Sexual Harassment/Harassment Prohibition policy will be subject to appropriate disciplinary action, up to and including termination.

All threats of violence made by employees of GOBC will result in immediate disciplinary action and may be subject to criminal action. Additionally, all threats of violence made to GOBC employees may result in termination of services and/or legal prosecution.

GOBC may refuse entry to its premises or require the departure from its premises of anyone who GOBC, in its sole discretion, believes has violated or may violate this policy.
GOBC employees must report immediately any instance of workplace violence to their supervisor, Department Director, HR Director or CEO.

Any police involvement at GOBC or GOBC property must be reported to the CEO as soon as possible. Employees should notify his/her director and the director will notify the CEO unless the employee's Director cannot be reached then the employee should contact the CEO directly.

113: Dress Code

<u>DRESS AND APPEARANCE</u>

Professional relations between and amongst staff and our clients and the public is essential to the successful operation of our mission. Staff should be attired in an appropriate manner at all times while working for the organization. Failure to comply will subject the employees to discipline, up to and including termination. It is up to the sole discretion of management to determine if an employee has violated this policy and management may mandate that the employee goes home to change their clothes.

A. Prohibited items: Clothing and other items not permitted include, but are not limited to, the following:

- Dirty or stained clothing, except as having occurred during the work day
- Clothing with cutouts or otherwise exposed areas
- Cut-offs
- Clothing with inappropriate pictures or text (implied or otherwise)
- Tattoos with obscene comments and/or gestures (implied or otherwise)
- Halter or tube tops, spaghetti straps, and sheer garments
- Short dresses or skirts defined as being more than 2” above the knee
- Shower or ‘flip-flop’ type footwear
- No open-toed shoes will be allowed at any of our Head Start Centers
- Disruptive or potentially dangerous jewelry
- Sleeveless clothing by all food service personnel
- Nail polish or fake finger nails of any length by food service personnel

B. Health and safety: Federal OSHA requires that certain protective equipment/clothing must be worn in some cases, which may include clothing, gloves, safety glasses, safety shoes and other clothing. In other situations, Infection Control Regulations require the use of gloves, gowns, masks, etc. and that they be made available to employees at no charge. Requirements for OSHA, Public Health, and other regulations governing clothing, will supersede GOBC requirements.
Additional requirements which exceed regulatory sources may be set by GOBC in response to health and safety concerns of specific activities and/or programs.

These additional requirements include, but are not limited to, the following:

- Appropriate hair restraints must be worn by all food service personnel
- Food service workers and maintenance staff are required to wear heel-in, toe-in, and non-slip shoes.

C. Violations: If an employee is in violation of the dress code, the employee may be required to go home and change. The time required doing so will be **unpaid**.

D. Liability: GOBC will not be held liable for damage to clothing or accessories while on duty.

114: Safety and Health

It is the policy of GOBC to ensure a safe and healthy workplace for all our personnel. To accomplish this policy, we will have an active, progressive, and effective safety, health, and accident prevention program designed to protect all personnel from occupational injury and illness, and equipment from loss or damage.

- All staff is required to comply with the Safety and Health Program standards in all work situations.
- Supervisors are also required to instruct and promote the maintenance of a safe, accident-free, and healthy work environment.

Pursuant to OSHA regulations, employees are required to maintain a safe work environment/ workspace and immediately report any and all workplace accidents to their immediate supervisor. As a safe and healthy work environment is of paramount importance, all employees must maintain safe work habits, especially when working off site, and must immediately inform their direct supervisor in the event of a work-related accident.

Safe working habits include, but are not limited to, the following:

1. The utilization of protective eyeglasses, support devices, hard hats and clothes in construction zones;
2. Ensuring safe lockout/tag out of electrical and gas sources when construction will impact either of these utilities;
3. Maintaining a worksite/workspace free of excessive clutter/debris and/or poisonous chemicals;
4. The placement of warning and cautionary signage where circumstances dictate;
5. Observing due care when conducting any task of an inherently hazardous nature.
6. Not engaging in acts which endanger the health or life of a fellow employee or citizen.

Failure to adhere to the mandate to maintain a safe working environment and to promptly report workplace accidents could result in discipline up to and including termination. Please refer to the GOBC Health and Safety Plan in the Progressive Discipline Section for further information and graduated discipline measures.

Further information on OSHA can be found at www.osha.gov

115: Laptop Security

Each employee provided with a laptop by Greater Opportunities for Broome and Chenango (GOBC) is responsible for the physical security of the laptop. All laptops acquired for or on behalf of GOBC are deemed to be company property.

All employees must take the following actions to ensure the physical security of GOBC laptops:

- When not in use, the laptop must be locked with a password and caution taken when entering any company passwords on the laptop.
- Store the laptop in a safe place in your home when not in use.
- Do not leave your laptop in your vehicle. If it is necessary to leave the laptop in your vehicle for a very short period of time, the laptop must be locked in the trunk of the vehicle.
- When using the laptop in public areas, do not leave the laptop unattended for any length of time.

During travel:

- Do not pack your laptop in checked luggage.
- Attach a name tag or business card to your laptop to easily identify it during security checks or if lost.
- Store the laptop in a hotel room safe or locked safe if available.

Policy Violations

Violation of this policy may be grounds for disciplinary action up to and including termination of employment. If an employee's laptop is stolen due to negligence, the employee will be responsible for the cost of replacing the laptop.

SECTION 200: STANDARDS OF PERFORMANCE AND CONDUCT

The quality and quantity of work shall be satisfactory to supervisors and dialogue between employees and supervisors is encouraged. The employee shall exercise reasonable judgment and initiative in the performance of their duties. They shall demonstrate a willingness to help and cooperate with others. They shall be a dependable and trustworthy individual and in no way impede or interfere with the effectiveness of GOBC.

201: Professional Code of Ethics and Standards of Conduct

CODE OF ETHICS

It is important that employees avoid conflicts of interest and maintain high standards of conduct. A conflict of interest is a situation in which an employee's private or economic interest interferes with or in any way influences the employee's duties and responsibilities at GOBC or with GOBC's general activities, even if this conflict has no adverse impact on job performance.

Employees must advise the CEO of any substantive, continuous outside employment (on either a salary or a fee basis). Any employee needing advice about a potential conflict of interest should consult with the CEO. If an employee's outside activity is determined to constitute a conflict of interest and the activity continues beyond a reasonable amount of time, disciplinary action will result, up to and including termination of employment.

All employees must sign a Conflict of Interest Policy for Employees statement (Appendix A) and Code of Conduct & Pledge of Ethics for Staff (Appendix B). It is the employee's responsibility to inform the CEO of any current or future conflicts of interest.

GOBC's reputation and the trust and confidence of those we serve are among our most vital corporate resources. We are committed to conducting business in an ethical manner that requires adherence to all laws, regulations, and ethical practices.

Employees have a responsibility to work in the best interests of GOBC and to avoid situations and actions that are, or create the appearance of being, in conflict with GOBC's objectives and principles. While it is not possible to list every circumstance that may lead to a conflict of interest, the following are examples of employee activities that must be obvious:

- Dedication to GOBC's mission, vision, and core values and recognition that the chief function of GOBC, at all times, is to serve the best interests of our constituency.
- Obligation to report: Each employee is required to sign and abide by the policy and report violations to his/her supervisor or director for resolution.
- Compliance with the law: GOBC's policy is to obey the law and regulations.
- Employees should act with honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships.
- Full, fair, accurate, and timely disclosure of relevant facts in all reports and documents dealing with matter of program service, governance, and business administration.

- Personal use of agency property: Employees may not use, divert, or appropriate agency property, equipment, services, or assets for personal use or benefit. An exception can be made with the express consent of the CEO.
- Expense accounts: GOBC expense accounts must be accurate and responsible.
- Employee’s responsibility: Each employee must protect confidential information to which he/she had authorized access or which is gained inadvertently.
- Prompt internal reporting of code violations to an appropriate person or persons within the organization.
- Proper conduct with clients: Employees are at all times to treat each other and clients with respect, equity and fairness regardless of race, religion, gender, ability, age, national origin, or other protected class under federal, state or local law.
- Employees will respect and promote the unique identity of each child and family and refrain from stereotyping on the basis of gender, race, ethnicity, culture, religion, disability, or other protected class under federal, state or local law.

Proper conduct with children:

- Understand that maintaining confidentiality is important to the success of our mission, our reputation in the community and the privacy of clients and staff. Family files, personnel records, financial information, client information, and other related information is considered confidential. Staff and volunteers are required to protect this information by safeguarding it when in use, filing it properly when not in use, and discussing it only with those who have a legitimate need to know. If approached by members of the news media requesting information regarding Head Start and/or GOBC, refer them to the CEO.
- No child will be left alone or unsupervised while under staff care. No child may be removed from the presence of staff other than by a child’s own parent or guardian or other authorized person.
- Employees will use positive methods of child guidance and will not engage in corporal punishment, emotional, sexual or physical abuse or humiliation. In addition, employees will not employ methods of discipline that involve isolation, the use of food as punishment or reward, or the denial of basic needs.
- Employees will respect the unique identity of each child and family and refrain from stereotyping on the basis of gender, race, sexual preference, ethnicity, culture, religion, disability, or income.

202: Conflict of Interest and Representation

The standard of behavior at GOBC is that all staff, volunteers, and board members scrupulously avoid any conflict of interest between the interests of GOBC on one hand, and personal, professional, and business interests on the other. This includes avoiding conflicts of interest as well as perceptions of conflicts of interests.

Board and/or staff members will not accept or seek, on behalf of self or any other person, any financial advantage or gain other than nominal value (as defined and determined by the IRS) which may be offered as a result of the board member's affiliation or staff's employment.

GOBC staff and board members will sign GOBC's conflict of interest policy on a yearly basis.

203: Confidentiality

- The business of GOBC must be respected as strictly confidential. Employees will: Maintain full confidentiality of information obtained as a result of your employment.
- Represent the best interests of GOBC as defined in your Job Description and this Employee Handbook.
- Speak positively of GOBC to all current and potential stakeholders and constituencies.
- Not use or otherwise relate one's employment with the promotion of partisan politics.

It is essential that everyone affiliated with GOBC (board members, employees, volunteers, interns, etc.) have a commitment to confidentiality. This involves respecting the client's right to privacy and creating a level of trust so clients may receive effective services through open discussions and dialogue.

All employees are to respect and hold all information obtained in the course of employment with GOBC in the strictest confidence. Employees are to protect confidential information and refrain from discussing such with business/professional associates, family, relatives, and friends.
The policy on confidentiality, as set forth below, will be adhered to:

- Do protect the identity of clients unless it is necessary to reveal for the purposes of providing services. Be particularly cautious of disclosure to family, friends, or other agencies.
- Do protect the privacy of a client's situation. This includes telephone calls or messages from clients; be especially careful about discussing a client or his/her situation openly in front of others.
- Do verify callers before releasing client information to outside inquiries.
- Do be aware of your surroundings including other employees when discussing a client or using a client's name on or off the telephone. Keep all client messages

and/or documentation secured to the extent possible.

- Employees will not retain any copies of documents or other material relating to confidential information.
- Employees will not inappropriately discuss or disclose any information regarding client cases to which they have been assigned and/or have access to.
- Employees will not discuss the details of specific services provided to a client with anyone, unless special approval is given by the supervising staff member.
- Employees will not mention the client's name or any personal, physical, emotional, or financial condition to anyone outside the agency, including family members.
- Employees will not discuss confidential matters with the client in public places.

204: Criminal Convictions and Pending Arrests

Pending Arrest or Accusation

If an employee is arrested or charged with committing a crime, it is to be reported to his/her supervisor immediately. GOBC may require that the employee provide proof of the disposition in a timely manner. GOBC will not make inquiry into any arrest or criminal accusation that has been dismissed, disposed of as a youthful offender adjudication, resulted in a conviction for a violation which was sealed or resulted in a conviction which was conditionally sealed. All employees are required to disclose to GOBC all currently pending arrests or criminal accusations and to accurately answer questions concerning a history of any criminal conviction. Accuracy and honesty are paramount. GOBC complies with federal, state and local laws protecting an employee from discrimination on the basis of arrest or criminal accusation.

Criminal Conviction

GOBC will not disqualify an individual from employment or discriminate against an employee solely on the basis of a criminal conviction. Consistent with law, GOBC may properly consider the specific duties and responsibilities of the position, the bearing the criminal offense will have, if any, on the individual's ability to perform the duties or responsibilities of the position, and other permissible factors under law.

A. All employees are required to accurately answer questions concerning a history of any criminal conviction that occurred prior to their employment with GOBC. Accuracy and honesty are important. GOBC will not inquire about and an employee or applicant shall not disclose a criminal conviction that was sealed or conditionally sealed. Furthermore, inquiry will not be made about and an employee should not disclose any criminal offense that resulted in youthful offender adjudication.

B. GOBC will review each disclosure individually, as required by law, in order to assess the relevancy, if any, of a criminal conviction.

C. Furthermore, current and prospective employees and volunteers working for GOBC Head Start and/or with or around children:

   a. Will be required to sign a declaration that lists:
      - Any pending criminal arrests, charges or accusations related to child sexual abuse and their disposition;
      - Convictions related to any form of child abuse and/or neglect; and
      - Any felony conviction.

   b. As a condition of employment, employees are subject to screening through the State Central Registry of Child Abuse and Maltreatment.

   c. Inquiry will not be made regarding and employee or volunteer shall not disclose convictions sealed by the court, a criminal offense that resulted in a youthful offender adjudication or convictions that were reversed on appeal and the charge dismissed.

D. All employees and volunteers for Head Start and/or other licensed day care programs as well as any employees who will be working in our Head Start facilities must be fingerprinted in accordance with NYS Day Care Licensing Regulations.

E. GOBC will comply with all requirements of the Drug-Free Workplace Act. **See Handbook Sections 106.**

205: Public Announcements

Public announcements, on behalf of GOBC, regarding public issues may be made only by the CEO (or Designee) and/or the President of the Board of Directors. Department or program specific announcements may be made by the Department Director or designee.

206: Prohibition against Acceptance of Gifts, Gratuities and/or Favors

Staff shall discourage the offer of, and decline, individual gifts or gratuities of value (over $25) in any way that might influence the purchase of supplies, equipment, and/or services. Staff shall notify their immediate supervisor if they are offered such gifts. If candy, flowers or other items of small value (up to approximately $25) are delivered unannounced to the office (such as at holidays), the items will be shared with the staff.

207: Outside Employment

- Such employment shall not interfere with the efficient performance of the employee's duties.

- Such employment shall not involve a conflict of interest or conflict with the employee's duties.
- Such employment shall not involve the performance of duties which the employee should perform as part of his/her employment.
- Such employment shall not occur during the employee's regular or assigned working hours
- Exempt employees whose duties are not confined to a standard workday or workweek must give primary responsibility to their employment with GOBC.

Altering, falsifying, or tampering with attendance or time cards, or recording time on another employee's time card/record may result in disciplinary action, up to and including termination of employment.

SECTION 300: EMPLOYMENT PROCEDURE

Uniform procedures will be followed in the employment of all personnel. Applicants for employment with GOBC will be considered qualified if:

A. They meet the minimum qualifications of the position and dictates of the program that are included in the positions respective job description.

B. He/she, or a member of his/her immediate family, does not serve on a board or committee at GOBC if that board or committee has authority to order personnel actions affecting his/her job. Staff should never sit on the same committee that a relative sits on.

C. The position applied for is not screened, recommended, selected, hired or supervised by a member of their immediate family which for purposes of this Section 300 policy is defined as follows:

Spouse, son, son-in-law, daughter, daughter-in-law, father, father-in-law, mother, mother-in-law, brother, brother-in-law, sister, sister-in-law, grandparent, grandchildren, domestic partner, and any member of, or resident in, the household of the employee.

In addition, recognizing that there may be relationships other than those named that are close relationships, other relatives or relationships may be included, depending upon the circumstances of individual cases.

When an employee marries, or a close relationship among employees is otherwise created, and the resulting relationship conflicts with the above restrictions, one employee will be moved to another supervisory position or have another department to supervise.

GOBC prohibits organizational relationships between employees that create the possibility or appearance of favoritism or conflict of interest or that have the potential of sexual harassment. Any employee who is aware that a prohibited defined relationship combination exists or is created by an organizational change or a change in personal relationships must promptly notify management.

NEPOTISM POLICY

Board members and their immediate family members (as defined above) will be excluded from consideration for employment by GOBC.

Employees shall not hold a position with GOBC while they or members of their immediate family (as defined below) serve on the board of directors or any committee of the board.

Employees may not hold a job over which a member of their immediate family exercises supervisory authority. Immediate family, for purposes of this section is defined above.

301: Hiring

A. Hiring of Chief Executive Officer: The Board of Directors will hire the Chief Executive Officer.

B. Hiring of Department Directors: The CEO will hire the directors of each of the departments at GOBC. The Head Start Director will be hired by the CEO with the concurrence of the Head Start Policy Council.

C. Hiring of Exempt Employees: Department Director and/or HR Director will hire all exempt staff with the written approval of the CEO.

D. Hiring of Non-exempt Employees: Non-exempt (hourly) staff will be hired by the Department Director and the HR Director.

E. Head Start: All Head Start staff will be hired by the Head Start Director with concurrence of the Head Start Policy Council, and the CEO in the case of exempt staff.

- **All Head Start employees or any employee who will be directly working with children must complete the following clearances before they can start employment: SCR (State Central Register), Fingerprints CRC (New York State Criminal Record Check), National Criminal Record Check with the Federal Bureau of Investigation (FBI), SEL (Staff Exclusion List), search of the NYS Sex Offender Registry, Mandated Reporter, Physical and TB tests.**

- **Any individual who resided outside of NYS in the preceding five years, the following background checks will also be required: a search of the criminal history repository in each state where the individual resides or resided outside of New York, a search of any state offender registry or repository in each state where the individual resides or resided outside of New York, and a search of state-based child abuse or neglect repository in each state where the individual resides or resided outside of New York.**

- The HR Director will contact the prospective employee to have them complete the required paperwork; employment will be contingent on receiving all clearances and Policy Council approval.
- After the HR Director receives all clearances and Policy Council approval, she/he will contact the prospective employee to officially offer them the position and give them a start date for employment.

F. Rehire: Prior to rehiring a former employee, supervisors must obtain written approval from the CEO (excludes 10 month and seasonal employees).

G. Head Start regional office will approve the hiring process when mandated.

Updated 9/26/24 PC Approved 8/27/24 Board Approved: 9/25/24

H. **Temporary Provisional Letter for Employment: If all the clearances required for a new employee's CBC (Comprehensive Background Check) are complete except for the SCR (State Central Register), Greater Opportunities may issue a temporary provisional letter for employment to the prospective employee. The letter will state that the employment is contingent on receiving the approved SCR, and that the new employee cannot be alone with children until the approved CRC (Criminal Record Check) letter is received. The HR Director will monitor the status of the SCR and inform the Head Start Director and the CEO of the outcome. The temporary provisional letter for employment will be valid for no more than 90 days from the date of issuance. If the SCR is not received or approved within this period, the employment will be terminated.**

An applicant or former employee who was previously involuntarily terminated or who resigned in lieu of termination is ineligible for rehire.

302: Process

All job openings within GOBC will be posted within each department at GOBC for at least three (3) working days. GOBC employees may respond to the posting and their application will be considered first in filling the vacancy. However, the vacancy will be filled based on qualifications and experience, current employment does not guarantee the applicant will be selected for the position.

Department personnel and Human Resources are responsible for the orientation of new employees.

It is the responsibility of the Human Resource department to keep all records current including performance evaluations and progressive discipline if any. All documents maintained in personnel files will be available to an employee upon their written request; inspection of a file will take place in the presence of the Human Resource Director or designee.

The following changes should be reported to Human Resources:

- Legal name change
- New home address
- New home telephone number
- Persons to be reached in case of emergency
- Changes in beneficiaries for the life and retirement plans
- Changes in motor vehicle driving records
- Arrests and/or convictions
- Changes in dependents for group health insurance

Interviewing expenses – The GOBC Board of Directors will determine interview expenses, moving expenses and any other expenses determined when hiring Chief Executive Officer.

302A: GOBC Hiring procedure Board Approved: 1/14/2022

1. Hiring manager notifies HR about a job opening.
2. HR Posts job – Internally (at least 3 days) and externally as needed.
    - During the 3 days when the position is posted internally all letters of Intent will be sent to the HR department.
3. HR receives applications and resumes. Applications are reviewed to verify the following questions are answered as required:
    - Do you have a valid driver's license?
    - Are you 18 or over?
    - Have you ever been convicted of a felony? HS/EHS/OCFS
4. HR forwards the applications and resumes to the appropriate program hiring manager.
5. Interviews are scheduled by the hiring program managers through phone calls and email. The hiring manager will notify HR of the interview schedule including the date of the interview and the applicant names.
6. The follow-up correspondence to the potential new staff will include all the interview information, time, date, location, who, and what to bring.

7. When scheduling interviews, the hiring manager will request that the applicant brings the following documentation to the interview:
    i. A valid driver's license
    ii. Diploma or GED
    iii. Transcripts if needed
8. Interviews are conducted by the hiring manager internal and/or external.
9. The interview questions will be provided by HR with assistance from the Hiring Manager for each specific job opening.
10. HR will provide a list of benefits and questions that will need to be discussed with HR if the potential employee inquiries about them during the interview. i.e., higher wage, additional vacation time….HR will provide a document to the Hiring Manger with HR information to be reviewed during the interview.
11. After the interviews are complete the hiring manager conducts reference checks for external candidates. At least 3 references are required 2 professional and 1 personal. HR will provide a list of reference questions which are used for all candidate.
12. If the hiring manager decides to hire an internal staff and they will contact HR. If the hiring manager has decided not to hire the internal staff, they will notify HR and contact the staff directly.
13. If the position is for Head Start or Early Head Start the hiring manager will consult with the HS director on getting the Policy Council approval. Policy Council approval can be obtained at a monthly meeting or by email and phone calls. When you are requesting approval through emails or phone calls there must be a quorum for PC approval. When the required Policy Council approval form is completed, it will be attached to the potential employee references.
14. All completed paperwork is sent to HR.
15. HR completes a blue sheet.
16. HR makes the job offer to potential candidate.
17. Candidate accepts or declines position. HR notifies the hiring manager if the candidate accepts or declines position. If candidate declines the position HR discusses alternates with the hiring manager, if no alternates then the interviews resume.
18. HR emails or schedules a meeting to complete clearances with the new hire.
19. HR schedules drug tests and conducts background checks for all staff and fingerprints, physicals and TB tests for HS and EHS staff.
20. HR sends email to OCFS licensor with clearance attachments for HS and EHS staff.
21. HR completes the SCR online for HS and EHS staff.
22. Onboarding email is sent to new staff after clearances are complete.
23. HR will contact the hiring manager to let them know the employee's clearances and onboarding are complete. HR and the hiring manager will discuss the start date for the new employee.

24. HR will contact the new employee to give them a start date and details about their first day of work. **Last Updated 7/19/22**

303: Job Descriptions

Each position has a job description that summarizes its duties and requirements, and each employee will be given a copy. A signed receipt of the job description will be maintained in the employee's personnel file.

Please reference Section 400: EMPLOYMENT CLASSIFICATION AND SALARY DETERMINATION

304: Promotion and Transfers

All departments at GOBC, with the exception of Head Start, may transfer qualified employees to positions which the department believes would benefit the programs. Early Childhood Services requires Policy Council approval for all Head Start employees for promotions, demotions, and lateral transfers.

304B: Internal Hiring Policy – Board Approved: 12/22/2021

The Principle and Application

Greater Opportunities for Broome and Chenango, Inc. (GOBC) is committed to investing in its employees and supporting their professional growth and career advancement during their employment.

The internal hiring policy describes the process for recruitment from current Greater Opportunities employees to fill available vacancies.

The policy affects all employees interested in career growth/transition within GOBC. It outlines the procedure to be followed for internal recruitment and explains GOBC's role in facilitating internal job mobility.

Employees may apply for transfer Opportunities provided they meet the following eligibility requirements

- Minimum 6 months working in their current position
- Job performance is at a satisfactory level with no current disciplinary action
- Meet the minimum experience, skill and education to qualify for the vacant position.

Policy Highlights

Promotions and job mobility that enable employees to sharpen their skills and advance careers have the full backing of GOBC. To ensure fair and efficient hiring, the policy provides a guideline for managers and team members to follow.

The process is outlined in the following steps:

1. Hiring managers determine whether there are qualified candidates internally to fill a position. These employees will be contacted directly, but always within the company's succession plan.
2. The internal applications will be evaluated and the candidates will be given feedback.
3. HR will post a job ad internally (3 Days) and give employees a chance to apply. At this stage the hiring manager and HR will decide if they would want to advertise it internally first or together with an external advertisement.
4. HR will prepare a job posting with the input of managers to describe job duties and qualifications, including important details like benefits and work area. This will then be communicated through available platforms like email, intranet, and newsletters.
5. Shortlisted candidates will be called for an interview. This interview for internal candidates need not be as extensive as the one for external candidates.
6. The hiring manager will update all the internal candidates about the status of their applications. (Feedback on rejected applications may help the employees in the future to know what parts of their skills and qualifications they need to develop.)
7. All applications will be maintained with strict confidence. Candidates have a right to keep their application details private. Hiring managers must respect this wish until said candidate is hired for the position, if a candidate is unsuccessful the hiring team must continue their discretion. Once an employee is hired into another position, there will be a [two weeks] notice before they report to their new office, when possible. This will enable their managers to prepare for the transition.

Mobility within the Company

Changing positions vertically and horizontally within the company is encouraged if it matches the career plans of employees. Employees must be qualified for the jobs they seek to move into and may only apply for internal promotion or movement after they have completed their orientation period.

A manager's consent is not mandatory for internal vacancies. However, it is encouraged that employees are open about their career goals and create a habit of discussing them with their managers. This can be done during individual meetings or during performance review meetings.

A manager who understands an employee's goals is more likely to be able to assist with advice on internal opportunities and how best to prepare for them.

Hard work and job skills are to be recognized and encouraged at Greater Opportunities. GOBC also desires that employees succeed within the company and advance their personal careers. To this end, managers and team members should always discuss careers and mobility in the context of the employees' abilities and ambitions.

Staff who apply for open positions internally at GOBC are not guaranteed to be selected for the open position. An internal applicant will be considered for the position based on their qualifications and the best applicant for the position. Updated 12/13/2021

305: Resignation, Lay Off, Demotion, Suspension and Dismissal – updated 8/20/21

Resignation – Any employee at Greater Opportunities may resign by submitting a letter of resignation to their Department Director and/or HR Director or, in the case of the CEO, to the Board of Directors at least 28 calendar days prior to the effective date of the resignation.

Hourly staff are expected to give at least 14 calendar days' written notice and Exempt staff at least 28 calendar days' written notice. Since a longer period is desired, the intention to resign should be made known as far in advance as possible. Once employees give the required notice they will no longer accrue benefit time.

Employees who resign after providing adequate notice are entitled to receive unused vacation pay in a payment, not to exceed the maximum earned for an employee over a year's time. Employees who do not provide adequate notice shall be ineligible for accrued vacation reimbursement.

On the effective date of the resignation, the employee will not be allowed to use any accrued leave including: Vacation, Personal, and Sick leave. No employee shall be compensated for any unused sick or personal leave at the time of their resignation.

Employees who resign giving more than the required amount of notice will be allowed to use their benefit time until they reach the normal amount of notice required. *Ex. Employee gives 6 weeks' notice but they are only required to give 4 weeks. The employee is allowed to use their benefit time for the first 2 weeks.*

When an employee gives more than the required notice they may be allowed to use some of their accrued time as approved by the CEO.

Lay-off is the termination of employment at the will of the employer without prejudice to the worker, usually resulting from economic or other conditions within the agency that result in the abolition of the position. An employee shall make himself/herself available for an Exit Interview as detailed below.

Demotion is the removal from a position with an offer of another position with less responsibility or pay, due to the inability of the employee to perform the responsibilities of a position.

Suspension is an unpaid, employer forced leave of absence for employee actions that are deemed detrimental to one's performance of duties and/or the work environment. An employee shall make himself/herself available for an Exit Interview as detailed below.

Dismissal is the discharge of an employee from GOBC. GOBC may discharge an employee at any time, with or without cause or notice, and employment is always "at will." Reasons for discharge may include, but are not limited to, unsatisfactory job performance, impairment on the job due to alcohol or substance abuse, behavior inconsistent with the principles and mission of the agency as stated in these policies, and/or of certain acts contrary to applicable professional associations. The employee may be asked to leave immediately or be given a period of notice to be determined by the CEO. The dismissed employee is entitled to receive unused vacation pay in a payment, not to exceed the maximum earned for an employee over a year's time.

Retirement is when an employee decides to leave employment voluntarily and gives the required notice or more to leave employment. Employees will be allowed to cash out their total amount of accrued vacation time when they give at least the minimum required notice.

Exit Interview is a meeting with the employee's supervisor and/or HR Director and/or such other management staff as deemed necessary by the CEO or his/her designee where the employee is to provide such information as requested by his/her supervisor relevant to his/her position and tenure at GOBC.

306: Return to Work Policy Board Approved: 3/27/24

Purpose
This policy outlines the process for employees returning to work after a medical leave of absence due to a disability or injury. Our organization is committed to providing reasonable accommodations under the Americans with Disabilities Act (ADA) to ensure that employees can perform their essential job functions effectively.

Scope
This policy applies to all employees who are returning to work after a disability-related leave.
Accommodations and Work Restrictions

Essential Functions: Employees must be allowed to return to the same position (assuming there is no undue hardship in holding it open) if the employee is still qualified. The employee should be able to perform the essential functions of the position with or without reasonable accommodation.

Interactive Process: Be sure to stay in communication with Human Resources concerning your anticipated return to work date. When an employee requests a return to work, the HR department will engage in an interactive process with the employee. This process involves discussing the employee's medical condition, any work restrictions, and potential accommodations. HR will communicate the return-to-work process and expectations in writing to the employee before their expected return date.

Medical Documentation: Employees must provide medical documentation from their healthcare provider outlining any restrictions or limitations related to their condition. This documentation will guide the accommodation process.

Employees are required to provide a fitness for duty certificate before returning to work after an extended leave (such as FMLA). The certifications confirm their ability to return to work and perform the essential functions, with or without accommodations.

> *A **fitness-for-duty certification** is a statement from a healthcare provider that confirms an employee's fitness to return to work. When employee requests leave for their own or a family member's serious health condition under the Family and Medical Leave Act (FMLA). Purpose: The certification verifies that the employee can perform the essential functions of their job after being on FMLA leave.*
>
> ***Certification Process:***
> *The employee has obligations to participate and cooperate in the fitness-for-duty certification process, similar to the initial certification process.*
> *As an employer GOBC may contact the health care provider for clarification or authentication of the certification but cannot delay the employee's return to work during this process.*
> *No second or third opinions on a fitness-for-duty certification are required.*

The cost of the certification is the employee’s responsibility. Employees are not entitled to reimbursement for time or travel costs incurred in acquiring the certification. If you have any further questions or need additional information, feel free to ask!

Reasonable Accommodations: Our organization will make reasonable accommodations based on the employee's job description and medical restrictions. Accommodations may include modified work schedules, ergonomic adjustments, assistive devices, or other necessary changes.

Undue Hardship: While we strive to accommodate all employees, there may be cases where providing an accommodation would cause undue hardship for the organization. In such cases, we will explore alternative solutions or discuss potential job reassignment.

Temporary Accommodations: Even if an employee's condition is temporary or episodic, we will consider providing accommodations during the affected period.

100% Healed Policies: Our organization does not enforce "100% healed" return-to-work policies. Such policies violate the ADA, which requires employers to reasonably accommodate employees with disabilities, including those with ongoing medical limitations or restrictions.

Responsibilities

HR Department: Responsible for coordinating the return-to-work process, engaging in the interactive process, and ensuring compliance with ADA requirements.

Supervisors/Managers: Collaborate with HR to implement accommodations and support employees during their return.

Employees: Provide accurate medical documentation and actively participate in discussions about accommodations.

Review and Updates

This policy will be reviewed periodically and updated as needed to reflect changes in legal requirements or organizational practices.
For specific accommodation requests or questions related to this policy, please contact our HR department.

SECTION 400: EMPLOYMENT CLASSIFICATION AND SALARY DETERMINATION

401: Orientation for New Employees

The supervisor responsible for hiring an employee is also responsible for seeing that the employee receives all necessary training in order to do their job correctly and efficiently. Please note that different training may be required for different positions. This training should include, but need not be limited to, the following:

- Personnel Policies
- Departmental requirements
- Agency goals and standards
- Safety
- Employee benefits
- OCFS and Head Start regulations (as required)

Please reference Section 201: Professional Code of Ethics and Standards of Conduct

402: Full-Time Employee

After the interview process, if both the employer and employee believe employment will be mutually beneficial to GOBC, the employee may be hired at full-time status with a normal workweek consisting of thirty hours or more per week.

403: Part-Time Employee

After the interview process, if both the employer and employee believe employment will be mutually beneficial to GOBC, the employee may be hired at a part-time status of less than thirty hours per week.

404: Seasonal Employee

If it is mutually agreed by the employer and employee that continued employment will be beneficial to GOBC, the employee will be placed on regular status. The dates and times the employee works will coincide with the program needs.

405: Temporary Employee

Temporary employees are hired for a specified period of time, either full-time or part-time, with employment automatically terminating at the conclusion of the stipulated period. The maximum length of employment is for six (6) months. Extensions may be granted with the CEO's written approval and filed in the employees personnel file. All employees are subject to discharge earlier than the anticipated period of employment.

406: Substitute Employee

A substitute is a person who is on-call for short-term employment to fill a vacancy by a regular employee who is temporarily absent from duty. GOBC Head Start hires substitutes on a regular basis throughout the school year for staffing purposes.

When GOBC has a temporary opening for a regular open position, substitutes may be considered as "long-term" substitutes until a permanent staff is hired for the position. Once a determination is made that a long-term substitute is needed for a position the supervisor may inquire if there are any substitutes interested in the temporary position. Once a staff person has accepted the temporary position, they will be paid at a higher rate equal to a classroom assistant, or higher, if they have the qualifications that are required and it's a position requiring those qualifications. Even though the substitute will be paid at a higher rate of pay, they are not entitled to any other benefits that a regular full-time staff receives i.e., Holidays, Snow Days, Personal, or Vacation time, etc. unless such benefit is required by law including New York State Paid Family Leave and New York Paid Sick Leave. When the open position is filled with a permanent employee the substitute will be returned to the substitute rate of pay.

407: Exempt and Non-Exempt Employees

GOBC will comply with the Fair Labor Standards Act (FLSA) and New York State Labor Law and evaluate all positions as they relate to exempt and non-exempt personnel.

A. Exempt

An employee is not entitled to receive overtime compensation under FLSA if the employee is an "exempt" employee within the meaning of one of the following exemptions. An employee whose position is eligible for exempt status under federal and New York State law will be paid a weekly salary that is no less than what is required by law.

- **Executive Exemption:** This exemption applies provided that (1) the employee's primary duty must be managing GOBC, or managing a customarily recognized department or subdivision of GOBC; (2) the employee must customarily and regularly direct the work of at least two or more other full-time employees or their equivalent; and (3) the employee must have the authority to hire or fire other employees, etc.

- **Administrative Exemption:** This exemption applies provided that (1) the employee's primary duty must be the performance of office or non-manual work directly related to the management or general business operations of the employer or the employer's customers; and (2) the employee's primary duty includes the exercise of discretion and independent judgment with respect to matters of significance.

- **Learned Professional Exemptions:** This exemption applies provided that (1) the employee's primary duty must be the performance of work requiring advanced knowledge; (2) the advanced knowledge must be in a field of science or learning such as law, medicine, accounting, engineering, etc.; and (3) the advanced knowledge must be customarily acquired by a prolonged course of specialized intellectual instruction.
    - Teachers are exempt if their primary duty is teaching, tutoring, instructing or lecturing in the activity of imparting knowledge, and if they are employed and engaged in this activity as a teacher in an educational establishment. Exempt teachers include but are not limited to, regular academic teachers; kindergarten or nursery school teachers; teachers of gifted or disabled children; teachers of skilled and semi-skilled trades and occupations; teachers engaged in automobile driving instruction; aircraft flight instructors; home economics; and vocal and or instrumental music teachers. The salary and salary basis requirements do not apply to bona fide teachers. Having a primary duty of teaching, tutoring, instructing or lecturing in the activity of imparting knowledge includes, by its own nature, exercising discretion and judgment. 29 C.F.R. 541.303

B. Non-Exempt

Non-exempt employees are generally employed on the basis of a single "hourly rate." Non-exempt employees are eligible for overtime compensation at the rate of one and one half (1 ½) the regular hourly rate for hours worked in excess of forty during a given week. Hourly employees will be paid an hourly amount greater than or equal to the minimum wage requirement.

408: Salary/Wage Determination

Whenever possible, employees shall be compensated for work in accordance with local practice for comparable positions.

An employee's total compensation consists not only of the salary paid but also of the various benefits offered, such as group health and life insurance, paid leave time, etc.

To attract and retain highly qualified employees, GOBC endeavors to pay comparable wages to the profession and area. In keeping with this objective, pay scales are monitored on a regular basis to ensure that they are competitive with other not-for-profits. Adjustments are made to the wage and salary ranges in accordance with the availability of funds and with general economic conditions.

An employee's job classification and level of compensation are determined by the requirements of the job and such factors as responsibility, skill, training, education, and other related factors.

A. All wages paid by GOBC will be in compliance with Federal and State minimum wage requirements.

B. Process
   - GOBC will conduct or participate and access an annual wage comparability study.
   - All staff compensation will be reviewed minimally on an annual basis.

C. Department Directors will review compensation increases and submit recommendations to the CEO.

D. The CEO will complete a compensation review of Department Directors.

E. Retroactive pay will not be issued should the employee leave the employment at GOBC prior to the retroactive check being issued.

409: Performance Evaluations

Periodic performance evaluations shall be conducted according to the manner and schedule provided below. Job performance deficiencies will be communicated to the employee immediately in a constructive manner. Remedial actions will be recommended, in a written form, along with a timetable for their implementation. In addition, the consequences of the employee's failure to implement these suggested remedial measures will be clearly stated. Only the employee, immediate supervisor, the director and/or HR director will be involved in this strictly confidential process.

A formal performance evaluation is conducted to provide both supervisors and employees the opportunity to discuss job tasks, encourage and recognize strengths, identify and correct weaknesses, and discuss positive purposeful approaches for meeting goals.
Performance evaluations are generally scheduled approximately every twelve months. Performance evaluations will be conducted more frequently in the event of significant changes in an employee’s job description, performance, or at the request of the employee.

A performance evaluation will be performed by the immediate supervisor and/or department coordinator and discussed with the employee.

The signature of the employee will attest to their having read and understood the performance evaluation on the date indicated. The performance appraisal will become a part of the personnel file of the employee.

An employee may contest the evaluation within five (5) calendar days with a written request to the Department Director and/or HR Director.

410: Incentive Compensation (also in Section 4510. Employee Incentive Compensation of Fiscal Policies)

Upon the Chief Executive Officer’s approval, discretion and budget parameters, incentive compensation may be made available to attract and retain qualified employees and to serve as a motivator for maintaining high employee performance.

Incentive Compensation is compensation over and above the amount of pay specified as wages or salary.

Incentive compensation may be used by Greater Opportunities to improve employee morale, motivation, and productivity and it will be used as a thank you to employees who have achieved a significant goal. The significant goal and the amount of the compensation will be approved by the CEO. Compensation is a one-time payment to employees and will not become part of the employees’ base salaries.

Incentive Compensation is discretionary and may include:
- Salaries
- Wages
- Fringe benefits
- Lump Sum Compensation

2 CFR Part 200 (45 CFR §75.430) explains to recipients how and when they will be reimbursed for expenses, including employee salaries and incentive compensation. It authorizes the use of incentive compensation, so long as the employee's overall compensation is reasonable, the compensation is paid pursuant to a good faith agreement made prior to their rendering or pursuant to an established plan, and the incentive payments are adequately documented.

This Incentive Compensation Policy is designed to provide an effective means to motivate and compensate eligible employees on an annual basis. GOBC's policy gives the executive team the ability to decide on Lump Sum Compensation for all employees.

There are two conditions for this compensation:

- If the executive team determines that there are sufficient funds available due to staff turnover, delays in filling staff vacancies, or other viable sources and determines that the funds are not needed in other areas of the program, Lump Sum Compensation will be considered.
- The Board of Directors and Policy Council must approve the Lump Sum Compensation.

If the above conditions are satisfied, then Greater Opportunities will give Lump Sum Compensation to employees who:

- Are full-time and ten-month employees on regular status.
- Are employed by our company on the day when the compensation must be paid.
- Have not announced they intend to resign either verbally or in writing.

Tax Treatment and Reporting: Under Internal Revenue Service Regulations, payment of incentive or recognition awards must be included in the employee's income as wages subject to withholding for federal and state income taxes and applicable FICA taxes. The payment is reportable on the employee's Form W-2 in the year paid.

An employee who is at or exceeds the maximum rate of the pay range is eligible for a Lump Sum Compensation. The amount of the adjustment is not added to the employee's rate of pay.

411: Training and Career Development

GOBC promotes career development for all employees and provides training for a variety of skills. Documentation of all trainings and proof of attendance are to be maintained.

A. Employee responsibility: All employees are encouraged to develop personal and professional skills. It is an employee's responsibility to maintain related job skills, education, and certifications and licenses for his/her current position.

    - It is to an employee's benefit to provide the Human Resources Department with a copy of educational and training certificates for his/her personnel file.

B. In-Service Training: Each department is to conduct in-service training as needed for the purpose of evaluation, resolution of problem areas, and projection of methods of improving efficiency and planning, and meeting regulatory mandates.

- Employees will attend meetings and conferences which pertain to their area of specialization when requested by a supervisor and/or Department Director. Out-of-town meetings and overnights may be required.

C. Career Development: Employees are encouraged to enhance career skills. Whenever funds permit, they will be included in budgets to assist with career development. It is the responsibility of each Department Director to develop a method whereby these funds are available to all employees in the department on an equitable basis.

Cross reference Section 304: Promotion and Transfers

Greater Opportunities Training Days

For employees who attend trainings or activities at the request of Greater Opportunities, the program will:

- Pay for or allow you to adjust the time (within the pay period not to exceed 40 hours per week) for travel time and attendance.
- Pay for mileage if Greater Opportunities vehicles are not available.
- Pay the cost of the training.

Employees who attend non-required, non-mandatory training of their own free will and choice (including for purposes of professional development) may request funding from Head Start for the cost of the training. In order to be eligible for funding, the employee must obtain prior written approval from the employee's supervisor for the training. Greater Opportunities will not pay for trainings that are not required or approved in advance by Greater Opportunities.

SECTION 500: EMPLOYEE BENEFITS

GREATER OPPORTUNITIES FOR BROOME AND CHENANGO can amend or terminate employee benefits at their discretion.

501: Holidays

Regular full-time 12-month employees receive eleven (12) paid holidays per year paid on the basis of their normal work hours per week.

Part-time employees will receive holiday pay for their normal work hours when the holiday falls on their normal workday. If a holiday occurs during a full-time or part-time employee's vacation leave, the employee's vacation leave is not charged for the holiday.

The twelve (12) paid holidays are as follows:

1. New Year's Day
2. Martin Luther King Day
3. Presidents Day
4. Memorial Day
5. Juneteenth
6. Independence Day
7. Labor Day
8. Columbus Day
9. Veterans Day
10. Thanksgiving Day
11. Day after Thanksgiving
12. Christmas Day

***** If an employee calls in for any reason the day before the scheduled Holiday or the day after the Holiday, they will forfeit holiday pay. The employee may use accrued time if it is available. If an employee calls in for any reason the day before the scheduled HS Paid Leave or the day after the Head Start Paid Leave, they will forfeit one paid day. The employee may use accrued time if it is available. The CEO may authorize an exception based on a review for extenuating circumstances. *****

502: Leave

Employees will be eligible to accrue paid leave on the first day of regular employee status.

Department Directors or designee will approve leave at their discretion or leave based on seniority which is determined from the date of regular status at Greater Opportunities.

When employee requests leave under a given leave classification, it will be charged against that classification.

Taking time off without approval from your direct supervisor may result in disciplinary action, up to and including termination of employment.

If an employee works extra hours (more than their scheduled hours) within the pay period and they use benefit time in the same pay period (Vacation, PT, Sick, Bereavement, including hours given to staff by the CEO when closing early for Holidays, bad weather, and any other days when the employee is receiving pay for non-worked hours etc.) then the extra hours will be taken off the benefit time.

If an employee uses more than one type of benefit time this is the order the extra time will be deducted from the benefit time.

- Time given to staff for not working
- Personal Time

- Sick
- Vacation

Example: If a 35 hour employee works 35.5 hours in a pay week and they also have 7 hours vacation time in that pay period, the .5 hour will be removed from the vacation time so the employee will only use 6.5 hours vacation time. Hours worked per week in excess of 40 will be paid at the over-time rate.

No Pay: (definition - taking a day off without using accrued time or receiving any reimbursement for the time off) “No pay” days are not an option when employees have accrued vacation and/or personal leave time. If employees have no vacation/personal leave time, “no pay” days must be authorized by the Department Director or designee with approval from the CEO. Unauthorized “no pay” days may result in disciplinary action up to and including termination of employment. Sick leave may not be used to substitute “no pay”.

503: Vacation Leave

A: Vacation

At GOBC, full-time and part-time regular **yearly (12 Month) employees** are eligible for paid vacation leave. Employees who started working at GOBC prior to 2/28/24 will continue accruing vacation at their current rate.

This policy will take effect on 2/28/2024 for yearly staff starting work after this date.

Vacation leave is determined by an employee’s years of employment with GOBC. Full-time and part-time regular employees are eligible for paid vacation leave. The employer reserves the right to determine when the employee actually takes vacation. Vacation leave may vary due to the needs of GOBC.

A. Vacation BOD approved: 2/28/24

New employees accrue vacation at the rate of **0.0384 hours** for hours worked in a pay period from the date of regular employment status to the end of the first calendar year.

New employees cannot use vacation time during their first **90 days of employment.**

Vacation leave will be given to regular employees at the beginning of their full calendar year as follows:

- **Year 1-4**: An employee will be given **10 workdays** of vacation leave.
- **Year 5-6**: An employee will be given **15 workdays** of vacation leave.
- **Year 7+**: An employee will be given **20 workdays** of vacation leave.

The CEO may authorize a change in the level of vacation accrual as a method of recognition.

B. Accrual of Vacation Leave: Regular employees will accrue their allotted vacation time on the last day of each pay period. Vacation leave may accrue up to a maximum of 140 hours for employees working 35 hours per week. Employees are allowed to carry over a maximum of 140 hours through the last payday (***this date will fluctuate according to the payday schedule***) of the year.

If an employee has over 140 hours max after the last payday of the year and before the first payday of the next year, the hours will be removed to equal 140 hours. Employees will lose vacation leave in excess of the maximum allowed.

C. Leave Request: A request for vacation leave must be approved at the discretion of the Department Director and/or supervisor in advance. A request greater than two (2) consecutive days needs a minimum of one-week advance notice and approval.

Approved Leave Request Forms will be on file in the PAYCO time care system with the associated time card for that period.

Please note that this policy is subject to change, and it's essential to consult your HR department or relevant documentation for any updates or specific details related to your employment with GOBC.

Vacation Leave may be used and recorded in increments of no less than 15-minute intervals.

D. Full-time employees on regular status leaving GOBC employment will be paid unused vacation leave, subject to the Notice provision required by Section 305.

E. If a holiday occurs during an employee's vacation leave, the employee's vacation leave balance will not be charged for the holiday.

F. Accrual Extensions: Under extraordinary circumstances, accrued vacation leave may exceed the maximum if the work in a particular department makes it impossible for the Department Director to grant a vacation. In this case, the Department Director must provide justification in writing for the vacation time to which the employee is entitled, and the employee will be required to utilize the extension at the first available opportunity. This extension must be approved by the CEO prior to being granted.

G. Rehire: Vacation status may be reinstated after a 90-day orientation period at the level of leave available before the break in service if the employee is rehired within (5) years.

Accrual Cash Payout: Under extraordinary circumstances, accrued vacation leave may exceed the maximum, if the work within the agency prevents employees from taking their accrued vacation leave. In this case the CEO may grant permission for the excess leave to be paid out. The excess amount of leave to be paid out will be determined by the CEO/Board of Directors.

504: Sick Leave

GOBC provides paid sick leave benefits for all regular employees for periods of temporary absence due to illnesses, or injuries. Full-time, part-time, and ten-month employees on regular status are eligible to take paid sick leave.

Employees who are unable to report to work due to illness or injury must notify (call directly not text) their direct supervisor before the scheduled start of their workday 2 hours prior to the shift starting or as soon as possible prior to the shift starting. The direct supervisor must also be contacted on each additional day of absence unless prior arrangements are made.

The purpose of sick leave is to provide continuity of service and income for employees who must be absent due to illness, or illness or death in the employee's immediate family.

A member of an employee's immediate family includes: Spouse, parent, brother, sister, son, daughter, correlating in-laws, grandchild, grandparent, or domestic partner.

A physician's statement or reasonable proof of illness will be required when absent for three (3) days or in a situation where questions arise concerning the legitimacy of absence. The employee must provide the doctor's note to their direct supervisor or the HR Director prior to the start of their shift when they return to work. If the employee does not present the doctor note prior to the start of their shift, they will be sent home without pay and cannot return to work until they bring the note.
Regular employees accrue sick leave at the rate of one day per month, up to a maximum of forty (40) working days (280) hours. Employees with over 12 years of service may accrue a total of sixty (60) days (420) hours sick leave.

Sick leave may be recorded on timecards in 15-minute intervals.
Staff leaving GOBC employment will not be paid for unused sick leave.

Rehire: When an employee is forced to leave GOBC through no fault of his/her own and is rehired for the same position within twelve (12) months, any sick leave that had accrued and was lost in the previous termination will be reinstated.

The NY Paid Sick Leave benefit (effective September 30, 2020) whereby employees will be accruing a minimum of 1 hour for every 30 hours worked and to use in increments of 4 hours or less. This new statute requires accrual to begin September 30 with employees eligible to use January 1, 2021. The statute requires employers with 100 or more employees to give employees a minimum of 56 sick hours to accrue based on hours worked. This statute is specific that the leave must be allowed for physical, mental illness and domestic abuse related matters. All employees are eligible for this statute including “substitute” employees.

Cross reference Section 806: Donating Sick Time

505: Bereavement

Updated 9/26/24 Board Approved 9/25/24

An employee who wishes to take time off due to the death of an immediate family member should notify his or her supervisor as soon as possible.

Employees are allowed up to 3 days for their close family members with approval from their supervisor. The 3 bereavement days may be used for a spouse, child, parent, grandparent, parent-in-law, grandchild, domestic partner or child of a partner. Employees are allowed 1 day off for all other family members. If more time is needed, employee may use personal or vacation time with approval from their supervisor.

506: Personal Leave

Personal Leave is for pressing personal business and personal issues that cannot be conducted at any other time. Employees may request personal time to cover days taken off due to personal reasons. Employees may use personal time when they arrange for it in advance from their supervisor. If the employee does not get prior approval, then the supervisor may deny him or her use of their personal time.

Full-Time employees at GOBC will receive (3) personal days (21) hours on January 1st to use through the last payday *(this date will fluctuate according to the payday schedule)* of the year.

Updated 9/26/24 Board Approved: 9/25/24

Head Start Employees who do not work over the summer will receive (3) personal days (21) hours to use through the last payday *(this date will fluctuate according to the payday schedule)* of the year.

Part-time employees will receive pro-rated personal days based on their regular work schedule. Employees who are hired during the year will be given a prorated amount of personal time based on their start date.

Personal leave may be recorded in 15-minute increments.

For all employees, personal days must be used each year (they do not roll over to the next year) and they do not accrue.

An employee leaving GOBC employment will not be paid for unused personal leave.

507: Jury Duty, Attendance as a Witness or Temporary Military Leave

Employees summoned for jury duty, attendance as a witness or temporary military leave must advise their supervisor as soon as possible. All relevant documents issued to the employee should be presented to the supervisor for review.

Absence for jury duty will be allowed. No payment by the courts is made to any juror for the first 3 days of jury service if they are employed by an employer who has more than 10 employees. Such employers are prohibited by law from withholding the first $40 of daily wages during the first 3 days of jury service. GOBC will reimburse employees for a full work day when reporting for jury duty up to the first 3 days (not covered by the courts), which shall be no less than $40. The balance of the jury duty days will not be paid by GOBC but if the court pays the employee less than their normal daily rate an employee can use accrued benefit time.

All employees will be paid their regular wages. Benefits will continue during the leave in the usual manner. However, the employee will offset their wages by any amounts received as jury or witness fees or military pay.

New York State law prohibits an employer from subjecting an employee to penalties or termination of employment due to jury service so long as the employee notifies the employer upon receipt of the jury summons. An employer cannot limit the amount of time an employee can be off work for jury service.

In order to verify to an employer that jury service was preformed, jurors may request that court staff provide them with an attendance slip called "statement of service form," which is required by GOBC.

The employee, absent because of jury duty or attendance as a witness, must return to work for any reasonable time the court is closed during normal work hours.

Paid leave will not be granted to employees for court appearances in which the employee is the plaintiff, the defendant, or being paid as an expert witness. Employees may request vacation or personal leave for this period.

508: Extended Leave of Absence

Regular full-time, part-time, and ten-month employees may request an unpaid extended leave of absence to the Department Director with the reason for the leave stated. Confidential information will not be requested.

Leave may be granted by the Department Director, with the concurrence of the CEO. GOBC is under no obligation to grant the leave.

An extended leave of absence may be granted to an employee for up to six (6) months for reasons not covered under other leaves. During this period, benefits are suspended until the employee returns to work and is eligible to re-enroll. COBRA benefits may be available. Leave and seniority are not accrued during this period. An additional extension may be requested.

The employee is required to use available accrued vacation and/or personal leave before “No Pay” during an extended leave of absence.

GOBC will make every reasonable effort to reinstate the employee in a comparable or the same position to that which they left.

509: Family and Medical Leave of Absence

<u>INTRODUCTION.</u> The Family Medical Leave Act (FMLA), codified at 29 U.S.C. 2601 et. seq. is intended to provide a means for employees to balance their work and family responsibilities by taking unpaid leave for certain reasons. The Act is intended to promote both the stability and economic security of families, and the national interests in preserving family integrity.

The Act was conceived in 1993 and is administered and enforced by the U.S. Department of Labor’s Employment Standards Administration. This agency investigates complaints of violations. If violations cannot be satisfactorily resolved, the Department may bring action in court to compel sufficient compliance. An eligible employee may bring a private civil action against an employer for violations. An employee is not required to file a complaint with the Wage and Hour Division prior to bringing such action.

<u>COVERED EMPLOYERS AND EMPLOYEES.</u> The FMLA is applicable to any employer in the private sector who is engaged in commerce or in any industry or activity affecting commerce, and who has 50 or more employees each working day, during at least 20 calendar weeks or more in the current or preceding calendar year.

In order to be eligible for FMLA leave, an employee must be employed by a covered employer and work at a worksite within 75 miles of where an employer employs 50 employees; must have worked at least 12 months (which do not have to be consecutive) for the employer; and, must have worked at least 1,250 hours during the 12 months immediately preceding the date of commencement of FMLA leave.

<u>COVERED CONDITIONS.</u> The FMLA provides an entitlement of up to 12 work weeks of job-protected, unpaid leave during any 12 months for the following reasons:

- The birth of a son or daughter or placement of a son or daughter with the employee for adoption or foster care;
- To care for a spouse, son, daughter or parent with a serious health condition;
- To take medical leave when the employee is unable to work because of a serious health condition that makes the employee unable to perform the essential functions of his/her

job;

- For any qualifying exigency arising out of the fact that the employee's spouse, son, daughter or parent is a military member on covered active duty or called to covered active-duty status.

An eligible employee may also take up to 26 work weeks of leave during a "single 12-month period" to care for a covered service member with a serious injury or illness if the employee is the spouse, son, daughter, parent, or next of kin.

In the context of the FMLA "serious health condition" is defined in the following ways:

1. An illness, injury, impairment, or physical or mental condition that involves: any period of incapacity or treatment connected with inpatient care (i.e., an overnight stay) in a hospital, hospice, or residential medical care facility;
2. A period of incapacity requiring absence of more than three calendar days from work, school, or other regular daily activities that also involves continuing treatment by (or under the supervision of) a health care provider;
3. Any period of incapacity due to pregnancy, or prenatal care;
4. Any period of incapacity (or treatment therefore) due to a chronic serious health condition (e.g., asthma, diabetes, epilepsy, etc.) which continue over an extended period of time, requires periodic visits (at least twice a year) to a health care provider and may involve occasional episodes of incapacity, a visit to the health care provider for each absence need not occur;
5. A period of incapacity that is permanent or long-term due to a condition for which treatment may not be effective (e.g., Alzheimer's, stroke, terminal diseases, etc.);
6. Any absences to receive multiple treatments (including any period of recovery there from) by, or on referral by, a health care provider for a condition that would likely result in incapacity of more than three consecutive days if left untreated (e.g., chemotherapy, physical therapy, dialysis, etc.)

Be advised that spouses covered by the same employer are limited in the amount of family leave they may take for the birth and care of a newborn child, placement of a child for adoption or foster care or to care for a parent who has a serious health condition to a combined total of 12 weeks (or 26 weeks in the case of a servicemen with a serious illness). All leave for these issues must be concluded within 12 months of the birth or adoption.

An employee may take family medical leave intermittently, or on a reduced work schedule. Intermittent leave is defined as "leave taken in separate blocks of time due to a single illness or injury." Employers can require that medical certification verify that intermittent leave or reduced leave is medically necessary.

A reduced schedule leave is a schedule that reduces an employee's usual number of working hours per week or per day. It is a "change in the employee's schedule over time, normally from full-time to part-time." To accommodate a reduced work schedule or intermittent leave, Employer may transfer the employee to another position of equivalent pay and benefits.

<u>EMPLOYEE BENEFITS CONTINUATION AND JOB RESTORATION.</u> During the period of leave, a covered employer is required to maintain the employees' health insurance coverage if said coverage was provided before the leave was taken. Same must be provided on the same terms as if the employee had continued to work. Employees may be responsible for their share of the premiums if same were deducted out of the employee's paycheck or paid through other means.

Be advised in some instances, the employer may be able to recover its share of health insurance premiums paid if the employee fails to return to work following expiration of the leave. Furthermore, upon returning from FMLA leave the employee must be restored to the employee's original job, or to an equivalent pay, benefits, and other terms and conditions of employment. An employee's use of FMLA leave cannot result in the loss of an employment benefit the employee was entitled to receive prior to the utilization of their FMLA leave. However, any bonus that was to be paid contingent on employee performance or other specified goals may be denied based upon that employee's failure to achieve such standards due to the employee's leave.

Other benefits, including cash payments chosen by the employee instead of group health insurance coverage, need not be maintained during periods of FMLA leave. Certain types of earned benefits, such as seniority or paid leave, need not accrue during periods of unpaid FMLA leave provided that such benefits do not accrue for employees on other types of unpaid leave. For other benefits, such as elected life insurance coverage, the employer and the employee may make arrangement to continue benefits during periods of unpaid medical leave. An employer may elect to continue such benefits to ensure that the employee will be eligible to be restored to the same benefits upon returning to work. At the conclusion of the leave, the employer may recover only the employee's share of premiums it paid to maintain other "non-health" benefits during unpaid FMLA leave.

Additionally, both employers and employees should be cognizant of the interplay between workers' compensation and FMLA leave. If an employee suffers a work-related injury, he or she can take FMLA leave time concurrently with their workers' compensation time.
All protections for employment apply eliminating an employer's ability to terminate an employee while on leave.

An eligible employee may choose, or GOBC may require the employee, to substitute accrued paid leave for FMLA leave. In this context, substitute means that the accrued paid leave will run concurrently with the unpaid FMLA leave. When paid leave is used for an FMLA-covered reason, the leave is FMLA-protected.

<u>NOTICE AND HEALTH CARE PROVIDER CERTIFICATION.</u> When leave is foreseeable, an

employee must provide the employer with at least 30 days' notice of the need for leave or as much notice as is practicable. If the leave is not foreseeable, then notice must be given as soon as practicable. An employer may require medical certification of a serious health condition from the employee's health care provider, and may require periodic reports during the period of leave of the employee's status and intent to return to work, as well as "fitness-for-duty" certification upon return to work in appropriate situations.

An employer may require that the leave for serious health reasons by the employee or family member of the employee be supported by a certification by a health care provider so long as employer gives the employee 15 calendar days to get the certification from the health care provider. The employer can also obtain a second opinion, at its own expense, and if the two opinions differ, the employer may require that the employee receive a third opinion, also at the employer's cost. The third opinion will be final and binding so long as the health care provider is approved by both the employer and the employee.

Health care providers who are eligible to provide this certification include: doctors of medicine or osteopathy authorized to practice medicine or surgery (as appropriate) by the State in which the doctor practices; podiatrist, dentist, clinical psychologists, optometrists, and chiropractors authorized to practice in the State and performing within the scope of their practice as prescribed by law of their State; nurse practitioners, nurse-midwives, and clinical social workers authorized to practice under the State law and within the scope of their practice according to the laws of their state; Christian science practitioners; any health care provider recognized by the employer or the employer's group health plan's benefits manage; and a health care provider listed above who practices in a country other than the United States and who is authorized to practice under the laws of that country.

<u>POSTING.</u> Employers are required to post a notice for employees which outlines the basic provisions of FMLA and are subject to a civil money penalty for willfully failing to post such notice. Employers are prohibited from discriminating against or interfering with employees who take FMLA leave. Most combined Federal and State Employment law posters contain information pertaining to FMLA.

A number of states have family leave statutes. Nothing in the FMLA supersedes a provision of State law that is a more beneficial provision. Under some circumstances, an employee with a disability may also have rights under the ADA and/or New York State law.
For further information on FMLA and other Wage and Hour and Employee Protection Laws, visit http://www.dol.gov.

Note: The Department of Labor's website and the U.S. and Hour Divisions Fact Sheet #28 was utilized extensively in the research and production of this policy.

GOBC – FMLA procedure

Employees requesting family medical leave must notify the HR Director in writing of the request, stating the beginning date of the leave, the probable duration of the condition and the time required to attend to the family members as applicable. The employee must provide certification acceptable to GOBC of the need for the leave from a certified health care provider. If an employee is out sick from work for more than 2 days their supervisor is required to inform the HR Director about the absence.

Employees should submit requests for family medical leave 30 days in advance of the leave, if possible. If 30 days' notice cannot be given, employees should submit the request as far in advance of the requested leave dates as possible to allow for rescheduling of shifts and reassignment of work.

GOBC may deny an employee's request for leave if the other parent of the employee's child also works for GOBC and their combined leave to care for a child after birth, adoption or placement into the home, or to care for a parent with a serious health condition, will exceed 12 weeks within a 12-month period.

<u>Effects on Benefits and Wages:</u>
Family medical leave is unpaid, except to the extent an employee:

- Is entitled to sick pay (see the Sick Pay Policy); or
- Is using accrued unused vacation for the family medical leave.

Employees must apply any accrued vacation to their family medical leave.

Family medical leave is not considered time worked for purposes of determining an employee's accrual for vacation or sick pay. An employee returning from family medical leave shall return with no less seniority than the employee had when the leave commended for purposes of layoff, recall, promotion, job assignment and seniority-related benefits such as vacation.
Health and welfare benefits remain in effect during a family medical leave.
Employees will be responsible for the employee contributions required for coverage on the same terms and conditions as for active employees not on leave. Employees should contact the HR Director for information about payment of employee contributions during a leave.

Workers' Compensation, state disability insurance, and accrued benefit time will run concurrent with FMLA approved time off.

<u>Returning to Work After Family Medical Leave</u>
Employees are expected to return to work on the first scheduled day following a leave. Failure to return to work at the end of the leave may result in termination of employment.

Employees should notify the HR Department of their intent to return to work at the earliest possible time prior to expiration of the leave. In turn, upon such notification, the HR Department should notify the employee of the employee's next scheduled day.

Any misrepresentation made to obtain or continue a leave is grounds for immediate termination.

GOBC will comply with any state or local law which provides greater family or medical leave rights.

509A: Military Leave:

MILITARY LEAVE

Military Leave without pay shall be granted to employees who enter the armed services. Such employees shall be afforded the protection of their status in the agency's retirement plan. Employees entering the armed services for thirty-one (31) days or more of duty shall be reassigned promptly upon return of civilian life if the employee returns within ninety (90) days after being honorably discharged. An employee entering the armed services for less than thirty-one (31) days shall be reassigned promptly upon their return to civilian life if the employee returns within two (2) days after being honorably discharged.

The armed services described above include all of the Uninformed Services of the United States of America, including the Army, Navy, Marine Corps, Air Force, Coast Guard, and the Public Health Service Commissioned Corps. Health benefits enjoyed by the employee entering the armed service may be maintained by the employee for himself/herself and his/her family for a twenty-four (24) month period, if the employee continues to pay the requisite premium as if the employee were continuing those benefits under COBRA.

For additional information regarding military leave rights, please refer to the GOBC posting area for the USERRA poster.

509B: New York Paid Family Leave

Employees are guaranteed up to 12 weeks of Paid Family Leave in 2021. Employers can deduct up to 0.126% more of an employee's paycheck to cover health insurance during paid family leave. ... Employees qualify for paid family leave after working 20 or more hours a week for 26 weeks (6 months).

Employees with a regular work schedule of 20 or more hours per week are eligible after 26 weeks of employment. Employees with a regular work schedule of less than 20 hours per week are eligible after 175 days worked.

509C: COVID-19 Quarantine Pay Board Approved: 1/26/22

New York State enacted legislation authorizing sick leave for employee's subject to a mandatory or precautionary order of quarantine or isolation due to COVID-19. All employees, regardless of the size of their employer, are entitled to job protection upon return from leave.

Greater Opportunities is required to pay COVID-19 pay to an employee if they are quarantined for themselves, or their minor dependent child, if either are subject to a mandatory or precautionary order of quarantine or isolation issued by the state of New York, the Department of Health, local board of health, or any government entity duly authorized to issue such order due to COVID-19. If an employer has one hundred or more employees, each employee who is subject to a mandatory or precautionary order of quarantine or isolation issued by the state of New York, the department of health, local board of health, or any governmental entity duly authorized to issue such order due to COVID-19, shall be provided with at least fourteen days of paid sick leave during any mandatory or precautionary order of quarantine or isolation.
The employee is provided up to 14 days of paid sick leave for a COVID-19-related quarantine, which should cover the period of a mandatory or precautionary order of quarantine or isolation.
The employee must be restored to his or her position upon return to work and there can be no retaliation for taking the leave.
Under certain circumstances, the benefits and protections of the law are not available to an employee who has traveled outside of the U.S.
NY Paid Leave – Eligibility

If an employee is given permission to work from home and is not showing symptoms and are physically able to work through remote access or similar means they are not eligible for COVID-19 quarantine leave.

The employee must submit documentation to prove a positive COVID- 19 test result. Along with a positive COVID-19 test result, an employee must provide a self-attestation or documentation from a licensed medical provider or testing facility attesting that the employee has tested positive for COVID-19. At home COVID-19 tests will be accepted by GOBC as proof of positive result.

GOBC will accept a self-attestation obtained from the health department website as proof of quarantine.

This is the link for Chenango County https://www.co.chenango.ny.us/public-health/nursing/covid19-at-home-testing.php

This is the link for Broome County https://redcap.vanderbilt.edu/surveys/?s=7KXH4EJNY4J7NE79

If the positive test was administered by the employer, then the employee does not need to submit documentation to that employer to receive COVID-19 paid sick leave benefits.

Employees may qualify for COVID-19 quarantine leave for up to three orders of quarantine or isolation. The second and third orders of quarantine or isolation must be based on a positive COVID-19 test.

An employee is not eligible for PFL or disability until they use up all available quarantine paid sick leave, then you can apply for the combined PFL and disability for the remainder of the quarantine. The number of paid days off is calendar days, and the pay required should represent the amount of money that the employee would have otherwise received for the 14-day period.

510: Social Security

Social Security applies to all personnel classifications and provides benefits to the employee upon retirement or disability. It also provides benefits to the family upon an employee's death.

511: Workers' Compensation

Workers' Compensation applies to all personnel classifications and provides benefits for employees who become disabled beyond seven (7) calendar days because of an injury or sickness related to their job. If death results, benefits are payable to the surviving spouse, and dependents as defined by law.

512: Short-Term Disability

New York State requires employers to provide disability benefits coverage to employees for an off-the-job injury or illness.

Disability benefits are temporary monetary benefits paid to an eligible wage earner, when he/she is disabled by an off the job injury or illness to replace, in part, wages lost due to injuries or illnesses that do not arise out of or in the course of employment. Disability benefits may be paid to eligible unemployed workers to replace unemployment insurance benefits lost because of illness or injury.

Disability benefits will pay up to 50% of your average wages (calculated over the prior 8 weeks) up to a maximum of $170 per week. Benefits are paid for up to a maximum of 26 weeks of disability during 52 consecutive weeks. For employed workers, there is a 7-day waiting period for which no benefits are paid. Benefit rights begin on the eighth consecutive day of disability. GOBC will supply eligible employees with written information about the disability application process.

513: Unemployment Insurance

Unemployment Insurance applies to all personnel classifications and provides compensation to eligible employees who are unemployed through no fault of their own, who are ready, willing, and able to work and who comply with other requirements as established by the New York State Unemployment Insurance Law.

514: Life Insurance

Life insurance is an employer-provided benefit and will be provided to employees at GOBC on the first day of the month following their date of hire. The employee will contribute $2.00 per paycheck and the balance will be paid for by GOBC. Eligible active employees are those who are regularly scheduled to work at least 25 hours per week.

Life insurance coverage will be continued for seasonal employees, those who have been suspended with or without pay, those on Worker's Compensation and those on Short-Term Disability during the times they are off the payroll but still employed by GOBC.

Employees on approved Extended Leave of Absence may continue life insurance coverage by paying the total premium, in advance, to the Fiscal Department.

If the option is available under the current policy, an employee may have a 'conversion privilege' and may purchase an individual life insurance policy without evidence of insurability if all or part of the employee's life insurance terminates because of termination of employment, reduction in the amount of coverage due to age or policy amendment. Converting the insurance would be the employee's responsibility. For detailed information, read the Group Life and Accidental Death and Dismemberment Insurance Plan, Summary Plan Description, for the employees of Greater Opportunities, Inc.

515: Employee Assistance Program (EAP)

GOBC cares about the health and well-being of its employees and recognizes that a variety of personal problems can disrupt their personal and work lives. Although many employees solve their problems either on their own or with the help of family and friends, sometimes employees need professional assistance and advice.

PROCEDURE

- All full-time, active employees are eligible for Employee Assistance Program benefits at no cost.
- The EAP is strictly confidential and is designed to safeguard an employee's privacy and rights. Information given to the EAP counselor may be released to the Organization only if requested by the employee in writing. All counselors are guided by a professional code of ethics.
- Personal information concerning employee participation in the EAP is maintained in a confidential manner. No information related to an employee's participation in the program is entered into the employee's personnel file.
- There is no cost for an employee to consult with an EAP counselor. If further counseling is necessary, the EAP counselor will describe community and private services available. The counselor will also let employees know whether any costs associated with private

services may be covered by their health insurance plan. Costs that are not covered are the responsibility of the employee.
- Contact the HR Department for more information about the EAP benefit.

EAP services will be provided to all EAP eligible individuals defined as regular employees who are scheduled for 20+ hours per week; a regular employee's spouse and dependent children to age 19; unmarried, dependent, full-time students from age 19 to the age of 25 (and working less than 30 hours per week, if employed); and/or unmarried children, residing with parent, regardless of age, who are mentally or physically incapable of earning their own living. Such employees, and family members, are eligible to participate in this program beginning with the first day of the month following the employee's date of hire.

EAP services do not extend to temporary or part-time employees working less than 20 hours.
Cross Reference Section 106G: Drug Free Workplace / EAP

516: Health Insurance

All full-time regular employees are entitled to benefits under GOBC's paid medical and life insurance plans, as may be in effect from time to time. GOBC reserves the right to change or terminate medical plans or other benefits at any time.

GOBC has established an employee elected health insurance plan which includes major medical. Currently, GOBC also has a separate dental and vision plan available. Employees electing to participate in the health insurance plan must participate for a minimum of one full month.

Employer contribution is available to full-time and ten-month employees whose work week consists of a minimum of thirty (30) hours. Currently, GOBC pays a portion of the cost and the employee pays the balance which is deducted from the employee's paycheck bi-weekly.

GOBC will continue the existing employer paid benefit of the health insurance contribution for 10- month employees who work in a temporary summer position in any department of GOBC.

Retired employees, or those on extended leaves of absence, are eligible to continue their participation in the health insurance group through COBRA, provided they pay the full premium plus 2% administrative charge, or their cost share, in advance by the twenty-fifth (25^{th}) of each month with payment to NYCON.

New full-time employees may enroll in GOBC available benefits on the first of the month following their date of hire. All existing full-time employees may also enroll during GOBC's open enrollment period. If an employee has a "life changing event" such as marriage, birth or adoption, divorce, or loses a spouse's health insurance coverage, the employee may enroll in the health insurance plan at any time of the year with documentation provided to the HR

Department. All employees are entitled to receive information from the Human Resources Department upon hire regarding the provision of health insurance or other such medical coverage for themselves or their dependents if same is to be provided.

Employees interested in enrolling or changing their coverage should contact the Human Resource Department.

517: COBRA: Continuation Health Insurance

The Federal Consolidated Omnibus Budget Reconciliation Act (COBRA) of 1985 gives employees and their qualified beneficiaries the opportunity to continue health insurance coverage under GOBC's group plan when a "qualifying event" would normally result in the loss of eligibility. Qualifying events include, but are not limited to, resignation, termination of employment, or death of an employee, a reduction in an employee's hours or a leave of absence. COBRA coverage may also be extended to eligible family members in the event of a divorce, legal separation, or if a dependent child no longer meets the eligibility requirements.
GOBC contracts with an outside company who provides each eligible employee with a written notice describing rights granted under COBRA when the employee becomes eligible for coverage under GOBC's insurance plan. The notice contains important information about the employee's rights and obligations. Employees will be provided with COBRA information and election forms upon a qualifying event, according to the law. An employee electing COBRA will be liable for the full cost of the health insurance premium plus a 2% administrative charge.

Persons interested in enrolling or changing their coverage should contact the Human Resources Department.

518: Flexible Spending Account

The Flexible Spending Account plan is an employee-paid deduction from the paycheck to reimburse the employee for qualified health related expenses that are not covered by medical plans and/or childcare expenses. Returning Employees are required to reenroll for this benefit every year during open enrollment.

For details, contact the Human Resource Department.

519: Career Development

Policy Updated: 10/20/22   BOD Approved: 10/26/22

GOBC Head Start and Early Head Start will reimburse staff for tuition, required college fees, books, and materials not covered by other forms of financial aid, provided the following requirements are met and funds are available:

- Prior to taking the course a "Request for Reimbursement form" is filled out and submitted to the Head Start Director and Fiscal Director.
- After verifying availability of funds, proper approvals are obtained and a signed copy of the request is given to the applicant.
- Application is made to all other financial aid (i.e., TAP, PELL, EIP, Quality Scholars etc.) and required documentation is provided.
- Upon completion of course, applicant must submit a purchase order with the following:

  - All pertinent invoices and receipts for the course.
  - Proof of application for financial aid and any funds received from these sources.
  - Proof of successful completion of the course, with a "C" grade or better.
    - The Fiscal Department will process all properly completed tuition reimbursement requests in a timely manner. A copy of the approved reimbursement form will be returned to the employee for their personal records.
    - Any improperly completed forms will be returned to employees for correction. All others will be processed with supporting documentation maintained in the Tuition Reimbursement file.
    - Employees are required to send a copy of their degree/transcripts to the HR department to be put in their employment record**.**

520: Tuition Reimbursement Policy

Updated: 10/20/22 BOD Approved: 10/26/22

The "Tuition Reimbursement" program has been established to assist Head Start and Early Head Start employees desiring to improve their knowledge and skills and to encourage career development. A well-trained, highly competent staff is a valuable resource to GOBC Employees and to the children and families we serve.
Eligibility

- Active regular full-time and part-time employees working at least 20 hours a week are eligible for tuition reimbursement.
- To qualify for reimbursement, courses must be offered through an accredited institution and must lead to a degree which directly relates to the employee's present position.
- Refer to policy 519: Career Development.
- Employees attending classes must arrange class schedules that do not interfere with their regularly scheduled work hours (unless a particular class is required to maintain current position). Sick time cannot be used for completion of college classes.
- Employees out on a leave of absence do not qualify for tuition reimbursement.
- GOBC may reimburse employees for successfully completed courses. A separate tuition reimbursement form must be completed for each course requested. If GOBC funds are available, employees will be reimbursed ½ of their tuition up to

$750 per bill with a $1,500 maximum per year after financial aid is applied. Priority will be given based on the date the employee submitted the application.

- Employees must remain employed for a minimum of one year following the receipt of any tuition reimbursement. If the employee leaves before the end of the year period, the employee must reimburse the tuition to GOBC.
- Any exceptions to the above policy provisions must be reviewed on an individual basis by the CEO prior to enrolling in the course. There are limited funds available so priority may be given based on budget and program constraints.

521: Retirement Plan 403B

A. Eligibility: Employees are eligible to participate in the GOBC 403B plan the first of the month after their date of hire. Employees can elect to participate any time after they are hired.

The method used for the Pension Plan shall function as follows:

Agency contribution: The agency shall contribute a percentage of the employee's gross pay authorized by the Board of Directors to the 403B account once the eligibility criteria have been met.

Changes in Contribution: Changes in the employee's contribution will be governed by the regulations set forth by the 403B account.
Ownership of Account: The 403B account and all contributions made to the account will become the property of the employee immediately upon deposit.

522: Donating Sick Time

An employee may donate sick leave hours for use by a specified employee(s), for "catastrophic" situations for the employee or relative of an employee, who has exhausted all of his/her accrued leave time (except 1 week of Vacation time) and is not eligible, or no longer eligible for other employment related benefits (i.e., Worker's Compensation).

GOBC allows the transfer of authorized sick time from one employee to another employee who is experiencing a serious financial hardship due to medical reasons and is unable to work. Employees and/or supervisors may not make any donation of sick time mandatory or in any way pressure others into donating sick time. Donations are on a voluntary basis only and must be approved by the HR Director or the CEO.

Examples of events which would qualify for sick time donations include:
Employee's life-threatening illness or injury,
Employee's medical leave that results in incapacitation for more than 30 days
Threatening illness or injury to an immediate family member (i.e., child, spouse, parents)
or Catastrophic loss of shelter (i.e., house fire, flooding, etc.)

Examples of events NOT approved for donated sick time include:
Minor medical problems (i.e., flu, stress, elective surgery), Illness of a non-immediate family member, Vacation

General Information and Procedures:

1. An employee may donate up to twenty percent (20%) of his/her accrued sick leave hours per calendar year for use by a specified employee(s) who meets the eligibility indicated above.
2. Staff wishing to donate hours must complete an Authorization to Donate Sick Leave Hours form and submit it to the HR Director within the specified time.
3. Donated hours will be deducted from the donating employee's eligible sick leave hours in the pay period following the receipt of the authorization form.
4. Should donations of sick leave hours exceed the need, unused time will be returned to active employees who donated time on a prorated basis.
5. A regular full-time and part-time employee is eligible to request donated sick leave hours after six (6) months of employment.
6. For the purposes of this policy, the term "relative of an employee" is as defined in the Sick Leave Policy.
7. A staff member who is in need of additional sick leave hours shall notify the HR Director and ask for a Request for Donated Sick Leave Hours form. The immediate Supervisor must sign the request for donated hours. Verification of need will be required (i.e., doctor's validation) as well as anticipated date of recovery/return to work. All persons involved shall protect the confidentiality of the applicant in accordance with GOBC policy and federal and New York State law.
8. The HR Director or his/her designee will solicit for donated sick leave hours using the various Agency communications available and at the discretion of and out of respect for the individual's privacy.
9. The HR Director or his/her designee will notify the applicant's supervisor of the number of hours available and adjust his/her sick leave hours accordingly during the next pay period and/or subsequent pay periods.
10. An eligible employee can use donated sick leave hours up to a maximum of three (3) months in any 365-day period.
11. If circumstances change for an employee who has had time donated to them, unused time will be returned to active employees who donated time on a prorated basis.
12. GOBC may not contribute days.
13. GOBC shall be held harmless concerning any actions that may be initiated regarding the donation of sick leave hours.

Coordination of Leave

1. An employee's use of donated sick leave hours will run concurrently with any other approved leave. The use of donated sick leave hours does not provide a guarantee that the employee will be returned to the same or equivalent position held prior to the leave or of

continuing employment, except as provided under applicable law (i.e., the Family Medical Act or Americans with Disabilities Act).
2. The donated hours are paid at the recipient's regular rate of pay and from the recipient's account.
3. Employees receiving other payments such as Worker's Compensation provided through the company's insurance programs are not eligible to receive donations.
4. There is a 2-week waiting period before the donations are reflected in the recipient's sick time bank.

523: NON-TRADITIONAL WORK SCHEDULES AND REMOTE WORK POLICY

New Policy Board Approval: 10/26/22

The purpose of this policy is to establish work schedule alternatives that support employee work/life balance, reduce commuting costs for employees and contribute to a healthier environment, while assuring the continued delivery of high-quality program services at all times.

The determination of alternate work schedules and telework options will be based on a number of factors including, but not limited to, the specific job responsibilities and schedules, the performance of the individual employee, and the ability of the employee to maintain an appropriate work environment if working at home.

Participation in alternate work options is not an entitlement; it is not an Agency-wide benefit and it in no way changes the terms and conditions of employment with Greater Opportunities. Participation in these options can be suggested by either the employee or the supervisor. The alternate work options can be terminated at any time.

An example of a non-traditional work schedule would be a full-time employee working four days per week in contrast with the more traditional five-day work week. This schedule can be utilized on a year-round basis when it is determined by the appropriate Department Manager and or CEO, to determine if this schedule best meets the needs of the program. Participation in the non-traditional work schedule is done with the necessary approvals only. A set schedule must be agreed upon and adhered to. Days off and work days cannot vary unless change is in response to scheduled work requirements and/or needs of the department.

Telework, also known as telecommuting, is an available option that may be informal, such as working from home on a short-term project. In all cases, telework requires supervisory approval and approval can be withdrawn at any time based on poor performance by the employee and/or changes to program needs and/or the determination that such an arrangement is having a detrimental impact on program functions or services.

When working from home, employees must agree to the following:

- To maintain contact by email, video conferences and telephone. Messages must be checked throughout the day.
- To establish a safe and appropriate work environment and to report any injuries suffered while performing work to their immediate supervisor, while following all related safety procedures.

- Telework will not be used as an alternative for appropriate child care. The focus of the arrangement must remain on job performance and meeting program needs. Teleworkers are encouraged to discuss expectations of teleworking with family members prior to entering into the work arrangement.
- Employees may use GOBC equipment assigned to them as part of their normal job duties, such as a laptop computer, while working at home. However, GOBC will not purchase internet access, or office furniture for the sole purpose of enabling an employee to work from home.
- GOBC will not be responsible for any expenses an employee incurs while working from home unless such expenses were pre-approved by the Department Manager and CEO according to the established Fiscal Policy.
- Supervisors and non-exempt employees will establish a clear understanding of work to be performed while teleworking and guidelines for determining performance. Telecommuting employees who are not exempt from the overtime requirements of the Fair Labor Standards Act will be required to accurately record all hours worked using PAYCO. Hours worked in excess of those scheduled per day and per workweek require the advance approval of the telecommuter's supervisor. Failure to comply with this requirement may result in the immediate termination of the telecommuting agreement.
- Employees will strictly adhere to the Confidentiality Policy and the Technology Policy and will affirm that appropriate safeguards have been established in home systems. The transportation of confidential written documents to and from an employee's home is prohibited.
- Employees are expected to attend all work-related events, including meetings, and to maintain a calendar of such events regardless of telework or alternative work schedules.

SECTION 600: TIMEKEEPING, ATTENDANCE, AND PAYROLL

Each employee will receive upon hire, a written notice (DOL form under section 195.1 NYS Labor Law), to be signed and acknowledged by both employer and employee documenting the following:

- Rate or rates of pay including overtime or a statement that the employee is exempt from overtime;
- How the employee is paid;
- On what day the payday falls;
- Official name of the employer and any other names used for business;
- Address and phone number of the employer's main office; and
- Allowances taken as part of the minimum wage (tip, meal, and lodging deductions).

601: Attendance and Punctuality

Attendance at work is a major responsibility of each employee. Absence from work can cause delays in services, require temporary assignments of other people and increase costs.

Attendance Policy Description

GOBC is a non-profit company, providing important and valuable products and services to people in need. In order to accomplish this mission, it is imperative that every employee be present when scheduled to fulfill client expectations.

GOBC awards its employees with sufficient vacation, holiday, sick, bereavement, and personal days throughout the year. Vacation and personal days must be scheduled with one's supervisor in advance (at least 24 hours for one or two days; two weeks' notice for three or more consecutive days). Only personal time and sick time (where available) may be used in the case of emergency or sudden illness without prior scheduling.

This policy details how absences and tardiness are counted for the purposes of maintaining excellent customer service throughout the business day. Information on the Family Medical Leave Act is included in Sec 509 of the Employee Handbook.

ABSENCES AND TARDINESS

1. Authorized Absence—The employee notifies his/her direct supervisor in advance and obtains approval to be away from or late, to work. This includes absences such as vacations, sick days, personal days, etc.

2. Unauthorized Absence—An employee not showing up for work, not calling in, or not having a valid reason for an absence, as determined by the administration. Advance notification of an absence is necessary to make arrangements to handle work in the absence of a scheduled employee.

3. Tardiness—An employee late for work, or leaving early from work on any work day without giving prior notification and receiving approval for the tardiness.

4. A non-exempt hourly employee who does not work or does not work his/her full shift is paid only for the actual time worked. If an employee has not **called in** to his/her direct supervisor before the start of scheduled work time, the employee is considered as having an unauthorized absence without pay. Time sheets are noted accordingly.

Excessive Absenteeism/Tardiness

1. Excessive Absenteeism or Tardiness—Absenteeism or tardiness that affects job, program, or Organization performance. If it is determined that absenteeism or tardiness has become unreasonable, the employee's director will determine the appropriate action.

2. An employee who is chronically or excessively absent or tardy may be subject to disciplinary action up to and including termination.

NO CALL/NO SHOW

Not reporting to work and not calling to report the absence is a no call/no show and is a serious infraction. The first instance of a no call/no show will result in a final written warning. The second separate offense may result in termination of employment with no additional disciplinary steps. Any no call/no show lasting two days is considered job abandonment and will result in immediate termination of employment. GOBC reserves the right to immediately terminate an employee without prior notice or disciplinary action.

Management may consider extenuating circumstances when determining discipline for a no call/no show (for instance, if the employee is in a serious accident and is hospitalized) and has the right to exercise discretion in such cases.

602: New York State Breast Milk Expression Policy   BOD Approval: 6/26/24

GOBC supports breastfeeding mothers by accommodating the mother who wishes to express breast milk during her workday when separated from her newborn child.

PROCEDURE

Employee Rights

- Employees are entitled to paid break time to express breast milk.
- Employers must inform employees of their rights upon hiring, annually thereafter, and when an employee returns to work following the birth of a child.
- Employees have the right to express breast milk for up to three years following childbirth.

Employer Responsibilities

- Employers are required to provide a reasonable amount of paid break time or meal time for breast milk expression.
- Employers must provide a private space (not a bathroom) for employees to express breast milk.
- Employers are prohibited from discriminating against employees who choose to express breast milk in the workplace.
- Any breast milk stored in the refrigerator must be labeled with the name of the employee and the date of expressing the breast milk. Any non-conforming products stored in the refrigerator may be disposed of.
- Employees storing milk in the refrigerator assume all responsibility for the safety of the milk and the risk of harm for any reason, including improper storage, refrigeration and tampering**.**

Notification Requirements:

- Employees must notify their employer in advance, preferably before returning from maternity leave.
- The notification must be made in writing, which can be sent through email, text message, or any chat-based app used by the organization that allows for the retention of messages

603: Workweek

The workweek begins on 12:00 am Saturday for seven consecutive days and closes at 11:59pm the following Friday.

604: Working Hours

GOBC standard work hours are 8:00 AM to 4:00 PM. Some departments may have extended or adjusted hours due to the program requirements.

Employee working hours will correspond to the needs of the participants and the program. The Department Director has the right to adjust an employee's work hours.

Meal Period: Every employee who works a shift of **six hours or more**, which extends between the hours of 11:00 AM and 2:00 PM, must take at least 30-minute unpaid break relieved from all job responsibilities.

Every person employed for a period or shift starting before 11:00 AM and continuing later than 7:00 PM shall be allowed an additional meal period of at least 20 minutes unpaid between 5:00 PM and 7:00 PM. GOBC requires staff to start their lunch periods so that they are back to work by 2:00 pm.

605: Preparation of Timesheets

Each Greater Opportunities employee must submit, through PAYCO, their electronic timecard to their immediate supervisor for approval by the end of business day Friday prior to payroll submission on Monday. When there is a Holiday on Monday of payroll week supervisors need to approve time sheets prior to Tuesday morning at 8:00 am.

Employees should not submit a timecard if it is incorrect. When employees submit their timecard, they are signing that the information on the timecard is correct, including total hours and benefit time used in that pay period.

If an employee submits an incorrect or incomplete time card then the supervisor must reject the time card and make any corrections necessary so the employee can re-submit.

Timesheets shall be prepared in accordance with the following guidelines:

The immediate supervisor will review all of their electronic timesheets and approve through the PAYCO payroll processing. Timesheets shall be prepared in accordance with the following guidelines:

1. Each electronic timesheet should have proper punches in/out for actual time worked.
2. No other employee may clock in/out for another employee. Errors shall be corrected by the respective supervisor with a proper description of error submitted in the PAYCO notes.

3. Errors shall be corrected by the respective supervisor with proper description of error submitted by the employee in the payroll notes.

4. Employees paid through more than one funding source shall identify and record hours worked or % of time based on the nature of the work performed on a Personal Activity Report (PAR Sheet).

5. Compensated absences (vacation, holiday, sick, and personal leave etc.) should be clearly identified as such through PAYCO.

606: Emergency Closing

When Broome or Chenango County and/or a municipality within Broome or Chenango County, has declared a 'state of emergency' and employees residing within those affected jurisdictions are not permitted to travel to work, they will be paid for their scheduled work hours and the time will be recorded as "Emergency Closed".

In the absence of a 'state of emergency', all employees are expected to report to their worksites. If the employee is unable to report to work, the absence will be recorded as vacation or personal leave. If no leave time exists, it will be a 'no-pay' day for non-exempt employees.

In the event of unusual circumstances, the CEO or designee, with the concurrence of the CEO, may close the department for the day. The remaining work hours will be recorded as "Emergency Closed". This policy does not apply to a "state of emergency" declared by a public authority due to a pandemic.

Head Start Snow Days (10-month employees only) – Some positions may be excluded from the below-referenced policy due to the nature of job and required hours.
Snow days will be granted according to the following policy:

- Snow Days will be determined by the Head Start Director, according to the GOBC Head Start weather-related school closing procedure.

For One Hour Delay

- Staff will report to work one hour after their normal scheduled time.

For Two Hour Delay

- Staff will report to work two hours after their normal scheduled time.

Early Dismissals

- Early Dismissal for staff is at the discretion of the Head Start Director.

Cancellations/Closings

- Direct supervisors will notify staff if their center is closed and they DO NOT have to report to work (see exceptions below). This is at the discretion of the Head Start Director.

Exceptions

- Staff must report when there are meetings/trainings scheduled (i.e., total staff training, component meetings/trainings, center meetings, and emergency parent conferences)

  unless Head Start Director cancels meetings/trainings for the day. Direct supervisors will notify staff if they DO NOT have to report to work.
- If you are unsure whether you should report or not, contact your direct supervisor.
- Any changes of this policy will be at the discretion of the Senior Management Team.

607: Attendance, Time, and Leave Sheets

An accurate record for all time worked is required on the PAYCO time care system. All hourly employees punch in and out daily on his/her electronic time card. Altering, falsifying, or tampering with attendance or time cards, or recording time on another employee's time card/record may result in disciplinary action, up to and including termination of employment.

An approved leave request will be submitted with the corresponding time card, when an absence occurs, reflecting the category of absence which is appropriate. The leave request must be approved by the employee's direct supervisor prior to the time being taken.

- Non-Exempt (hourly) Employees: All of the time records will be maintained on a daily basis, electronically submitted by the employee and approved by their immediate supervisor and/or director at the end of the pay period. All requests for leave will be approved at the supervisor's discretion.

  - Unless an hourly employee receives authorization, the employee is not allowed to work before or beyond the normal starting/ending time without specific overtime authorization. If an employee is away from the premises during the work shift this time must be recorded on his/her time card (i.e., personal business, medical appointment, lunch periods, etc.)
  - A note is required in PAYCO to show supervisor approval.
- Exempt Employees: Exempt employees will be compensated in accordance with the Fair Labor Standards Act. All of the time records will be maintained on a daily basis, electronically submitted by the employee and approved by their immediate supervisor and/or director at the end of the pay period. (See section 407)
- Employees who have a position that requires them to visit multiple sites need to clock in at the site where they start and/or finish work for the day. Employees may not leave their

"home site" early and clock out at a center that is closer to where they live.

607a: Exempt Employee Safe Harbor

GOBC complies with the applicable federal and state labor laws. It is our policy not to make deductions from the guaranteed salary of exempt employees, except for reasons permitted by law. GOBC may make deductions from an exempt employee's salary for the following reasons: (1) if the employee absents himself or herself for one or more full days for personal reasons and has utilized all accrued paid time off;

(2) if the employee absents himself or herself for one or more full days because of sickness or disability and has utilized all accrued paid time off; (3) as a penalty imposed in good faith for infractions of safety rules of major significance; or (4) if the employee is suspended in good faith, for one or more full days, for an infraction of our written policies on workplace conduct which are applicable to all employees.

If an exempt employee believes that an improper deduction has been made from his/her pay, the employee should immediately contact HR or the CEO, and there will be a prompt and full investigation. If it is determined that the deduction was improper for any reason, GOBC will reimburse the employee and take steps to assure that such improper deductions to not recur. GOBC will not retaliate against any employee who inquiries about a possible improper deduction.

608: Paychecks and Direct Deposit

GOBC encourages the use of direct deposit. For any employee not electing to have direct deposit, PAYCO will mail all live paychecks directly to the employee's home on the Thursday before payday.

All employees will have a PAYCO portal account which will provide access to all their payroll information electronically, i.e., paycheck stubs, W2's, accrual balances, etc., that can be printed out by the employee.

When payday falls on a holiday, checks may be issued on the preceding work day.

Employee requested changes in payroll

The fiscal office has 30 days to provide an employee's requests for a change in W-4's, copies of paycheck stubs, addition or deletion of bi-weekly deductions etc.

GOBC takes all reasonable steps to ensure that employees receive the correct amount of pay in each paycheck.

In the event there is an error on a paycheck the employee should bring the discrepancy to the attention of the Staff Accountant and the Fiscal Department immediately so that corrections can

be made as quickly as possible. The Fiscal Department will make corrections in the employee's next paycheck after the error was brought to their attention.
The law requires that GOBC make certain deductions from every employee's compensation. Among these are applicable federal and state income taxes. GOBC also must deduct Social Security taxes on each employee's earnings up to a specified limit that is called the Social Security "wage base." GOBC matches the amount of Social Security taxes paid by each employee and also offers programs and benefits beyond those required by law.

Eligible employees may voluntarily authorize deductions from their paychecks to cover the costs of participation in these programs. These voluntary authorizations must be in writing and kept in the employee's personnel file.

609: Court Ordered Deductions

With a legal order, employees' paychecks may be garnished.

610: Termination and Final Paycheck

Upon separation from employment, the employee's last or final payment will be made on the next scheduled payday. This paycheck will include remaining work hours and /or vacation leave due up to the max allowed to accrue per year, if any.

Employees must return any GOBC property upon request or termination and criminal charges may be filed based upon an employee's failure to return GOBC property.

SECTION 700: MISCELLANEOUS

701: Travel

All travel must be authorized by Department Directors who must review the Travel Authorization Form and sign the form.

Any employee who misuses travel expenditures may receive disciplinary action, up to and including termination of employment.

Greater Opportunities employees who operate agency vehicles or use their private vehicles for work related duties must comply with all laws, i.e., maintain a valid driver's license for the class of the vehicle driven, registration, inspection, observe all speed and traffic regulations, etc. In addition, employees who use their private vehicle for agency business must at all times maintain the NYS minimum insurance for that vehicle.

A. Greater Opportunities has established methods for obtaining driver's license reports for all Greater Opportunities employees. Employees whose positions require operating a vehicle may be deemed unemployable if the Greater Opportunities insurance agent regards them as unacceptable.

B. Employees are responsible for their own travel and parking violations such as: speeding tickets, parking in handicapped spaces and all other violations that the employee has control over.

C. Travel Expense Advances - Funds will be advanced for upcoming travel only upon receipt of a completed and properly approved travel authorization form. Greater Opportunities will reimburse employees at per diem rates established by the General Services Administration (GSA) for the location to which they travel for the number of days. When the per diem rate is used for travel advances for meals, Greater Opportunities does not require the return of receipts. In instances where the employee incurs (or has received an advance for) gas, parking or toll expenses, they will be reimbursed for these expenses upon return of the actual receipts that specify the dollar amount to be reimbursed. GOBC does not reimburse for incidental expenses per the GSA. A purchase order will need to be filled out with attached receipts for reimbursement. Documentation must justify that participation of the traveler is necessary for the Federal award and costs are reasonable and consistent with Greater Opportunities' travel policy. *(2 CFR Part 200.474(b)(1) and (2))*

D. Employees will be reimbursed for authorized travel only if there is not an agency vehicle available. For a required seminar, workshop, conference, or meeting attended, vehicle mileage will be paid from/to the actual point of departure/return or regular worksite, whichever is the least distance. Mileage for an employee whose job involves regular travel between work sites or participants' homes will be reimbursed to/from that employee's primary worksite unless his/her home is closer. Mileage will be reimbursed at a rate established by Greater Opportunities (Fiscal Handbook).

E. Hourly employees will record travel time which is not ordinary home-to-work travel as "work time" in the following manner:
   - When an employee attends a special one-day assignment in another city, such as a seminar or training event, he/she will record "work time" to include travel between the staff person's primary work location and the other city. GOBC may deduct/not count the time an employee would normally spend commuting to their regular work site.
   - Travel that keeps an employee away from home overnight is travel away from home. Travel away from home is work time when it cuts across the employee's work day. The employee is substituting travel for other duties. The time is not only hours worked on regular working days during normal working hours, but also during the corresponding hours on non-working days. Thus, if an employee regularly works from 9 a.m. to 5 p.m., Monday through Friday, the travel time during these hours is work time including Saturday and Sunday. Regular meal period time is unpaid. Time spent in travel away from home outside of regular working hours as a passenger on an airplane, train, boat, bus, or automobile is not

work time.

F. It is the employee's responsibility to immediately notify the Department Director of a currently pending driving-related arrest, conviction or a change in driver's license status (suspension, restrictions, etc.) Department Director will notify the HR Director of issues that may affect the employee's driver's license.
G. Report any accident to the authorities immediately, and then inform the Department Director of the accident. The Department Director will notify the Facilities Director. For damage to a vehicle that is not caused by accident, report must be made immediately to the Department Director. Examples of this would be slashed tires, cracked or broken windows/windshield from flying or thrown objects, or from falling tree limbs, etc. All accidents and incidents are to be reported on the Accident/Incident form and turned into the Fiscal Director by the next working day. Accident/Incident forms and Vehicle Report forms are required to be carried in the glove box of each agency-owned vehicle.

Any employee who does not follow the travel policies may be subject to disciplinary action, up to and including termination of employment.

701A: Transportation of Clients

GOBC employees are not allowed to transport clients in personal vehicles. GOBC recognizes the importance of assisting clients with transportation from one place to another, such as medical appointments, educational sessions and any other important health commitment.

GOBC vehicles must be used for any transportation of clients. Any employee who violates this policy may be subject to disciplinary action, up to and including termination of employment.

702: Local Travel

Local travel is considered travel in Broome and Chenango County, within 1 mile of the workplace. The minimum amount requested to be reimbursed for travel must be 5 miles or greater.

Mileage forms are to be submitted at least on a monthly basis to your supervisor for approval. Forms are reviewed by the Director and forwarded to the Fiscal Department. Employees must use a GOBC vehicle if available or they will not receive mileage reimbursement.

Exceptions may be made to this policy with CEO approval where mitigating circumstances exist.

703: Travel Out of Town

All out of town travel must be authorized by the CEO using the "Travel Authorization" form. The record of the trip showing mileage, destination and reason for the trip is to be attached to the form. Requests for Authorization on out of town travel and other reimbursements must be submitted to your supervisor at least 14 calendar days, prior to need, on the appropriate form.

704: Use of GOBC Owned Vehicles

Vehicles will be driven by an authorized driver at all times.

Personal use of agency vehicles is prohibited**.**

Vehicles must be reserved at the central office or at the center on a vehicle usage calendar, indicating the date, time duration, name and purpose. When a vehicle is needed by more than one individual, priority will be given by the one traveling the greatest distance.

There is no eating or smoking in any agency vehicle. Beverages are allowed only with tight fitting lids.

705: Correspondence

All correspondence that represents GOBC is to be professionally constructed.

All email users are to create an automatic signature that includes: name, title, Greater Opportunities, Inc. name and department, address, telephone, confidentiality notice, and fax number.

Confidentiality Notice: This information may contain confidential and/or privileged material and is only transmitted for the intended recipient. Any review, re- transmission, on version or hard copy, copying, reproduction, circulation, publication, dissemination, or other use of, or taking of any action, or omission to take action, and reliance upon this information by persons or entities other than the intended recipient will be enforced by all legal means, including action for damages. If you receive this message in error, please contact the sender and delete the material from any computer, Disk drive, diskette, or other storage device or media.

Any employee who does not follow the correspondence policy may be subject to disciplinary action, up to and including termination of employment.

Cross Reference Section 101: Internet Usage

706: Smoking

Smoking is prohibited in agency buildings, worksites, vehicles and/or client property. See no-smoking policy. *Cross Reference Section 106: Drug Free Workplace and Smoking Policy*

707: Telephones

GOBC telephones and voice mail are provided to conduct GOBC business.

Employees are to promptly answer telephones with the following statement: “Thank you for calling Greater Opportunities, this is (employee name) how may I direct your call?” All incoming calls are to be handled in a helpful and efficient manner. When an employee expects to be away from the telephone for an extended period of time, arrangements are to be made for calls to be answered including an “Out of Office” message on your voice mail.

It is recognized that some non-business calls are necessary. For this reason, GOBC does not desire to prohibit the use of telephones for personal use. Such calls should be limited in number and duration, and employees are not to abuse this privilege. When non-business or personal long- distance calls are placed, charges should be reversed or charged to the employee’s home telephone number.

707A: Cell Phone/Electronic Device Use Policy

GOBC recognizes that employees are our most valuable asset and that they are the most important contributors to our continued growth and success. Thus, we are firmly committed to employee safety and will do everything possible to prevent workplace accidents.

Crashes attributed to driver distraction are quickly on the rise, in large part because of widespread use of cell phones and other portable electronic devices behind the wheel. To protect employees driving on company business as well as others on the road, GOBC has developed this Cell Phone/Electronic Device Use Policy.

All employees are expected to follow applicable state or federal laws or regulations regarding the use of cell phones or PDA’s (*personal digital assistant)* at all times. Scope and Applicability

The Cell Phone/Electronic Device Use Policy applies to all GOBC employees driving for GOBC business in any vehicle, company or personal and with any phone business or personal.

General Information and Guidelines

Employees whose job responsibilities include regular or occasional driving and who are issued a cell phone or PDA for business use or who use their personal cell phone or PDA for business are expected to refrain from using their phone or PDA to text, receive or place calls, surf the web, email or instant message or to take pictures or video while driving.

Use of a cell phone or PDA while driving is not required by GOBC. Safety must come before all other concerns.

Regardless of the circumstances, including slow moving traffic, employees are required to pull into a rest area or parking lot and safely park the vehicle before placing or accepting a call or use hands-free operations, refrain from discussion of complicated or emotional matters and keep their eyes on the road. Special care should be taken in situations where there is traffic, inclement weather or the employee is driving in an unfamiliar area.

GOBC understands that sometimes, especially when traveling in unfamiliar areas, drivers require assistance with directions and may wish to use a GPS. GPS systems are extremely helpful devices, but they can also be distracting if used improperly. Employees must adhere to the following:

- Mounted GPS systems cannot block or obstruct the driver’s view in any way
- GPS systems must be voice narrated and must not require that the driver look away from the road to follow instructions
- Employees may not program the system while in motion
- Programming or otherwise engaging with the GPS screen may only occur while stopped or while pulled off the road

Employees who are charged with traffic violations resulting from use of their phone or PDA while driving will be solely responsible for all liabilities that result from such actions.

As with any policy, management staff is expected to serve as role models for proper compliance with the provisions above and are encouraged to regularly remind employees of their responsibility to comply with this policy.

Violations of this policy will be subject to the highest forms of discipline, including termination.

The following regulation is applicable to all GOBC Head Start employees:

NYSOCFS DCC reg 418-1.9 (n) Head Start
The use of any type of personal electronic media device for social or entertainment purposes, including, but not limited to, listening to music on headphones, playing screen games, surfing the internet, sending the internet, sending e-mails, or making personal calls while supervising children is prohibited. The use of mobile phones is permitted as necessary to promote the children’s safety and ensuring the orderly operation of the program.

708: Voting – New York Election Law

If a registered voter does not have sufficient time outside of his/her scheduled working hours, within which to vote on any day at which he/she may vote at any election, he/she may, without loss of pay for up to two hours, take off so much working time as will, when added to his/her voting time outside his/her working hours, enable him/her to vote.

If an employee has four consecutive hours either between the opening of the polls and the beginning of his/her working shift, or between the end of his/her working shift and the closing of the polls, he/she shall be deemed to have sufficient time outside his working hours within which to vote. If he/she has less than four consecutive hours, he/she may take off so much working time as will, when added to his voting time outside his working hours, enable him/her to vote, but not more than two hours of which shall be without loss of pay, provided that he/she shall be allowed time off for voting only at the beginning or end of his/her working shift, as GOBC may designate, unless otherwise mutually agreed.

If the employee requires work time off to vote, he/she shall notify his/her supervisor not more than ten nor less than two working days before the day of the election that he/she requires time off to vote in accordance with the provisions of this policy.

Not less than ten working days before every election, GOBC shall post conspicuously in the place of work where it can be seen as employees come or go to their place of work, a notice setting forth the provisions of this section. Such notice shall be kept posted until the close of the polls on Election Day.

709: POLITICAL AFFILIATIONS

GOBC, its management and administration will ensure, as far as reasonably possible, that all program activities are conducted in a manner which provides assistance effectively, efficiently, and free of any influence of partisan political bias.

GOBC employees may not:

- Use his/her official authority or influence for the purpose of interfering with or affecting the result of an election or nomination for office.

- Directly or indirectly coerce, attempt to coerce, command, or advise a state or local officer or employee to pay, lend, or contribute anything of value to a political party, committee, organization, agency, or person for a political purpose.

PROCEDURE

- Programs will not be carried on in a manner involving the use of program funds, the provision of services, or the employment or assignment of personnel in a manner supporting or resulting in the identification of such programs with:

    - Any partisan or nonpartisan political activity or any other political activity associated with a candidate, or contending faction or group, in an election for public or party office.

- Any voter registration activity.
- Any activity to provide voters or prospective voters with transportation to the polls or similar assistance in connection with any such election.

Nothing in this policy shall be interpreted to restrict an employee from running for public office, campaigning for a candidate for public office, or participating in fundraising activities for the benefit of a candidate, political party or political advocacy group. Such activities must be conducted outside of working hours, off of the GOBC premises and without use of GOBC's equipment or other property.

710: Information Technology and Security

Computer information systems and networks are an integral part of business at GOBC. The provisions of this policy apply to all GOBC employees and to others who access GOBC' electronic resources. GOBC is committed to providing and encouraging the use of modern electronic resources to improve job efficiency, to make job-related communications more convenient for employees and to help provide better service to clients.

It is the policy of GOBC that computers and computer accounts used by employees are provided to assist them in the performance of their jobs. The computer and network systems belong to GOBC and should be used primarily for GOBC business purposes.

A. An employee must generally limit his/her use of the Internet to valid business purposes associated with the performance of the employee's job. Use of the Internet for personal business is prohibited unless such use does not
(1) take up more than a minimal amount of the employee's time, (2) interfere with the employee's work performance, (3) interfere with any other employee's work performance or otherwise impede any business function of GOBC, (4) have an adverse impact on GOBC's Internet system, and (5) violate applicable laws or regulations or any of the prohibitions described in this policy or any other policy of GOBC.
B. Internet use is a privilege, not a right. Employee misuse of the Internet is a form of insubordination and may result in disciplinary action up to and including termination of employment.
C. An employee is to adhere to proper use of any copyrighted material found on the Internet.
D. An employee is not to access sites that are questionable in nature (i.e., pornographic, threatening, gratuitously violent, and or obscene); determinations will be made at the sole discretion of the CEO.
E. An employee is to report accidental entry into an unacceptable site immediately to his/her supervisor.
F. An employee is not allowed access to chat rooms on GOBC computers.
G. An employee is not to share others' confidential information on the GOBC computer system.
H. An employee is not to download software to any GOBC computer's hard drive without prior approval from the CEO.

I. An employee is not to play games on the Internet utilizing GOBC's computer system.
J. An employee is responsible for the appropriate use of the computer. Vandalism is a serious disciplinary act and includes damage to computer equipment, software, or files.
K. An employee may not use the Internet for any of the following activities:
   1. Commercial activities including solicitation.
   2. Revealing material protected by trade secret or confidentiality laws or policies.
   3. Accessing any "Social Networking" sites (i.e., Facebook, Myspace, etc.…) unless required for job purposes.
L. An employee is to limit the usage of the laptop computer (if assigned) to only those functions necessary to conduct GOBC business. They will take the proper steps to secure the computer in such a way as to prevent theft of the computer or stored material.

Security

A. GOBC has the right to take any action that it believes is necessary to ensure the integrity of its computer and network resources. It may, at the sole discretion of CEO or designee, edit or delete any program, document, or other information stored on any computer or network, including data stored on any personal computer owned by GOBC. It also has sole right to determine the appropriate content for the web site and portal, and to edit or delete any material posted there.
B. Users are responsible for safeguarding their passwords for the system. Individual passwords should not be printed, stored on-line, or given to others. Users are responsible for all transactions made using their passwords. Under no circumstances may users allow anyone but themselves to log on to any network owned by GOBC or GOBC Head Start using their password. Users must not leave their computers unattended without logging off from the computer or network.

Privacy - All activity on GOBC equipment becomes the property of GOBC.

A. GOBC has the right, but not the duty, to monitor any and all aspects of the computer system, including employee e-mail, to ensure compliance with this policy. Employees should not have the expectation of privacy in anything they create, store, send or receive on any GOBC computer.
B. Users grant permission to GOBC to include their name, Internet address, business address, and business telephone number in publicly accessible directories, databases, and documents, including a staff directory on the World Wide Web. All other personal information will be considered confidential, and will not be published or released in any form without written permission.

Confidentiality: All information about children and families receiving services from GOBC or GOBC Head Start is confidential. **NO** information may be shared with any person or organization outside GOBC or GOBC Head Start without the prior written permission from the family, except as mandated by law and Head Start policy. Head Start staff and volunteers must strive to protect the privacy of children and families in the program and should view or print confidential family information only when it is necessary to better serve the family.

Responsibility: GOBC is not responsible for the actions of individual users. This policy may be amended or revised periodically as the need arises.

New York General Business Law 899-aa

Notification; person without valid authorization has acquired private information

GOBC will comply with New York law regarding privacy, which requires the following: any person or business which conducts business in New York State, and which owns or licenses computerized data which includes private information shall disclose any breach of the security of the system following discovery or notification of the breach in the security of the system to any resident of New York State whose private information was, or is reasonably believed to have been, acquired by a person without valid authorization. The disclosure shall be made in the most expedient time possible and without unreasonable delay, consistent with the legitimate needs of law enforcement or any measures necessary to determine the scope of the breach and restore the reasonable integrity of the system.

Any person or business which maintains computerized data which includes private information which such person or business does not own shall notify the owner or licensee of the information of any breach of the security of the system immediately following discovery, if the private information was, or is reasonably believed to have been, acquired by a person without valid authorization.

The notification required by this section may be delayed if a law enforcement agency determines that such notification impedes a criminal investigation.
The notification required by this section shall be made after such law enforcement agency determines that such notification does not compromise such investigation.

The notice required by this section shall be directly provided to the affected persons by one of the following methods:

(a) written notice;
(b) electronic notice, provided that the person to whom notice is required has expressly consented to receiving said notice in electronic form and a log of each such notification is kept by the person or business who notifies affected persons in such form; provided further, however, that in no case shall any person or business require a person to consent to accepting said notice in said form as a condition of establishing any business relationship or engaging in any transaction.
(c) Telephone notification provided that a log of each such notification is kept by the person or business who notifies the affected persons; or
(d) Substitute notice, if a business demonstrates to the state attorney general that the cost of providing notice would exceed two hundred fifty thousand dollars, or that the affected class of subject persons to be notified exceeds five hundred thousand, or such business

does not have sufficient contact information. Substitute notice shall consist of all of the following:

(1) E-mail notice when such business has an e-mail address for the subject persons;
(2) Conspicuous posting of the notice on such business's web site page, if such business maintains one;
(3) Notification to major statewide media.

711: Information Security Risk Management

GOBC's information security risk management program is a critical function designed to improve the security posture and maturity of the organization. GOBC must understand its risks to be able to reduce its risks. The risk management procedures involve:

- Risk identification.
- Risk measurement.
- Risk control.
- Risk monitoring.

GOBC's risk must be evaluated against common best practice administrative, technical, and physical safeguards and specific additional industry-specific requirements. GOBC's information security objectives must include appropriate and formalized mitigation or acceptance of risk based on risk assessment results. The following common information security principles must apply to any risk management strategy:

- Availability. GOBC must have confidence that systems will be available to meet GOBC's business requirements. Availability includes allowing authorized users prompt access to information.
- Integrity of Data or Systems. System and data integrity involves making sure information has not been altered in an unauthorized manner. GOBC must ensure that systems are free from unauthorized manipulation that will compromise accuracy, completeness, and reliability.
- Confidentiality of Data or Systems. GOBC must implement controls to protect the data and systems that contain sensitive or critical data from external or unauthorized exposure. Confidentiality controls include protecting information of GOBC's, customers, and other third parties as necessary against unauthorized access or use.
- Accountability. Accountability involves the ability to record and trace systems and user actions from the originator to end source. Accountability controls support nonrepudiation, deterrence, intrusion prevention, security monitoring, recovery, and legal admissibility of records.
- Assurance. GOBC must have assurance that systems provide the intended functionality while preventing unauthorized actions. Assurance indicates confidence that technical and operational security measures work as intended.

712: Cyber Security Policy

One of the key areas of Cyber Security threats is human error. Although human error can never be eliminated entirely, incidents can be reduced with established clear cyber security guidelines and providing regular employee trainings. This policy is designed to give employees the do's and don'ts of cyber security.

Importance of Cyber Security
There are many risks involved in cyber security that can badly affect the individuals involved, as well as severely jeopardize the company.

Effective Password management

- Requirements for GOBC passwords - combination of numbers and letters.
- Where to store GOBC Passwords – in a secure location
- How to share passwords – only shared with the Technical Support Specialist if necessary no one else
- How often do we update passwords? – 90- or 120-days
  Employee should not use the same passwords for multiple sites.

Phishing and Other Scams
If an employee receives an email that looks out of the ordinary, even if it looks like an internal email sent by another employee, you must check the sender first before opening attachments. If you are suspicious of the email, contact the Technical Support Specialist before opening the email. Scams can also be perpetrated over the phone, so employees should be aware of people calling and asking for confidential company information.

713: Grievance Procedure

GOBC prohibits sexual harassment, other forms of harassment and bullying in the workplace (Policies 107: Sexual Harassment Prevention, [107a: Harassment Prevention] and 108: Anti-Bullying). With respect to other forms of conflict, to the extent possible, all employees should expect to resolve conflicts among themselves. An employee should present a grievance or individual problem in relation to his/her work in writing to his/her immediate supervisor. The supervisor shall notify the CEO that a grievance has been received. The supervisor shall respond to the employee. If the employee is not satisfied, he/she may present the grievance in writing to the CEO. The CEO shall then respond to the employee regarding the next steps or resolution. In all instances, the decision of the CEO shall be final.

GOBC strives to ensure fair, equal and honest treatment of all employees. Employees of all kinds, as well as supervisors and managers are expected to treat each other with mutual respect. Employees are encouraged to offer positive and constructive criticism.

GOBC is committed to encouraging an open and frank atmosphere in which any problem, complaint, suggestion, or question receives a timely response from GOBC supervisors and management.

If an employee disagrees with established rules of conduct, policies, or practices, he/she can express concern through the grievance procedure. This includes, but does not limit, questions or problems concerning safety, compensation, fair treatment, supervision, discipline, policies and practices, or working conditions.

If a situation occurs when an employee believes that a condition of employment or a decision affecting them is unjust or inequitable, they are encouraged to make use of the following steps, utilizing the various levels of supervision established. Levels of supervision within the Agency generally follow this pattern: Employee, Supervisor, and Department Director, Human Resource Director and then CEO. The employee may discontinue this grievance procedure at any step or contact the Human Resource Director at any time for assistance with this procedure.

A. The employee presents the problem, in writing, to their immediate supervisor within five business days after the incident, unless there are extenuating circumstances. If it is inappropriate to contact the immediate supervisor, the employee may present the problem to the next level of supervision. A copy of the complaint should go to the employee, HR and the supervisor (when appropriate) for follow up. An employee making a grievance may use the "Grievance Report" form, but any written format will be accepted.
B. Following the appropriate pattern of supervision, the employee may continue to present the problem to the next level of supervision until it is resolved or until the levels of supervision are exhausted.
C. After consulting with appropriate management, when necessary, each level of supervision will respond to the problem within five business days unless there are extenuating circumstances. Each level of supervision shall document the discussion and resolution. Nothing contained in these procedures shall be construed to deny a complainant the right to make a direct appeal to the appropriate agency, i.e., Human Rights or the EEOC.

714: Head Start In-Kind

In-kind is donated time, services, goods or materials. The Federal Government provides 80% of our money to operate Head Start. However, the Government expects parents and community volunteers to contribute the remaining 20% in what we call IN-KIND time instead of money.

Proper accounting for in-kind contributions requires documentation that will fully and clearly support each individual contribution. This documentation should contain quality, description, condition, donor's name, and basis for valuation for all items received as in-kind contributions.

These monthly in-kind forms MUST be submitted to the Central Office by the 5th of the next month**.**

The form must be signed by the responsible staff person and date. In-kind can be claimed for tems and services which would normally need to be covered by the Head Start operating budget.

715: Head Start Miscellaneous Team Meetings

Team meetings (Teacher, Assistant Teacher, Family Advocate and other staff or consultants involved with each group of children) are to be held twice a month to discuss problems and coordination plans. (See Procedures Manual for further information).

Monthly Calendars

Monthly calendars are developed by Administrative Staff with the center staff input. Additions are to be requested by the second week of the preceding month.

Mail

Center Directors are responsible for delivery and obtaining both in-house mail and materials from other sources to and from the central office, in a timely manner (2-3 times per week). This responsibility may be delegated to center staff but ultimate responsibility falls upon the center directors.

Supply and Form Requests

- All requests for supplies and forms must be written on the “Supply Request Form” posted at each center.
- This form is then brought to the Central Office.
- Requests will be filled within one week, unless unforeseen circumstances arise.
- Place your requests for forms or office supplies prior to running out so you do not run out.
- Be specific when placing an order (i.e., who is requesting, quantity requested, color, exactly what item you are requesting example: tape- scotch, masking, etc.)
- Do not expect “emergency” requests to be filled immediately.

Work Requests

When requesting work from the clerical staff, specify exactly what you need and when you need it. Submit all requests through your center director or supervisor at least one week in advance. All requests need to signed and dated.

GOBC Head Start Access to children’s records Staff Person

Only authorized staff persons may have access to the child’s folder. The folders are maintained in a locked file cabinet at the center. Authorized staff includes: Teacher, Teacher Assistant, Family Advocates, Coordinator, Director, or Center Director when observing or working directly with families.

Parents

Parents may review their child’s records by making an appointment with the teacher or Family

Advocate for the purpose of reviewing records.

A staff person must be present at all times to answer questions and explain materials, forms, etc. Parents may request copies of any/or all materials with the exception of those which came from another primary source and which have limited access from that source. No material may be removed from the file. Parents may have any additional information placed in the folder they feel is necessary. Parents may file a statement in the folder disputing any information that is in the file.

Other Agencies/Individuals
It may become necessary to request information from another agency to facilitate the best services for a particular family.

If this occurs, a written release is signed by the parent for the program to obtain this information. An explanation of the information we are seeking will be given to the parent. Other agencies may contact our program requesting information for a particular family. Information will be given to these agencies only after we have received a release signed by the parent. The Family Advocate will contact the parent if this should occur. GOBC will contact the parent should records be requested by another agency along with contacting the GOBC attorney.

Violation of Eligibility Determination
Any staff that intentionally violates Federal and program eligibility determination regulations or intentionally enrolls a child that is not eligible to receive Head Start services will be terminated.

716: OCFS Supervision of children

Maintaining Ratios
Staff/child ratios must be maintained at all times. In accordance with NYSOCFS regulations (418-1.8-Supervision of Children): Children cannot be left without competent direct supervision at any time. No person, other than a director, head of group or assistant to the head of group, may supervise a group independently even for brief periods of time, except in an emergency. No person under 18 years of age may be left alone to supervise a group of children at any time including in an emergency.

The staff/child ratio for three-year old’s is 1 staff member to 7 children. The staff/child ratio for four year old’s is 1 staff member to 8 children.

The Staff/child ratio for children ages 18 months-36 months is one staff member to 5 toddlers (OCFS) or one staff member to 4 toddlers per Head Start performance standards.

Supervision of Children
Competent staff supervision will be provided to children at all times. Teaching staff are to set up

classroom procedures to ensure that children are safe and supervised during all activities. Diligent supervision of children is critical in preventing accidents and ensuring safety.

Indoors:

- Staff strategically locate themselves throughout the classroom and on the playground to ensure children are visible at all times.
- Appropriate teacher/child ratios must be maintained during all activities.
- Teachers and other staff must know the exact number of children present at any time in a day.
- Prior to a staff member leaving the room, he/she must make certain that they notify other staff to ensure proper coverage is present.
- Child Accountability Chart system must be used to visually depict the names of children and their location throughout the day.
- Staff must remain alert for potential problems and be observant of every child in their class.
- Under no circumstances should staff use a telephone/cell phone to engage in personal business during the supervision of children.

Outdoors:

- Appropriate teacher/child ratios must be maintained during all activities.
- Teachers and other staff must know the exact count of children at all times, using face to name recognition.
- Staff members are expected to interact and observe children closely while on the playground.
- Active supervision of children includes staff positioning themselves as the children move throughout the environment. Visual supervision must be maintained at all times including within secluded play areas, tunnels, playhouses, etc. as well as areas of high traffic and mobility.
- While supervising children, staff members are not to stand together in a group and socialize with one another or engage in personal use of cell phones.
- Prior to a staff member leaving the playground, he/she must make certain that they notify other staff to ensure proper coverage.
- The Child Accountability Chart will be used at all times.
- Staff must remain alert for potential problems and be observant of every child while outdoors.

The Child Accountability Chart

The accountability chart will be posted in a visible location in the room. Every child should have his/her name on a card.

Remember to add the names of children who come in after attendance has been taken, as well as remove the names of children who leave early.

Whenever a child is taken out of the classroom, the person removing the child must move the child's name card to the appropriate area: Speech, OT, PT, Other (i.e., nurse, teacher, CD, etc.). When the child returns to the classroom, the person returning the child must then move the child's name card back to the "Present" section. Teachers will make a visual count of the remaining students to ensure the accuracy of the accountability chart.

The child accountability chart must accompany the class when they go to the playground/large motor room.

Face to name recall must occur upon leaving the outdoor area and upon return to the classroom.

At all times, GOBC Head Start employees will comply with the following:

NYSOCFS DCC reg 418-1.9 (n)
The use of any type of personal electronic media device for social or entertainment purposes, including, but not limited to, listening to music on headphones, playing screen games, surfing the internet, sending the internet, sending e-mails, or making personal calls while supervising children is prohibited. The use of mobile phones is permitted as necessary to promote the children's safety and ensuring the orderly operation of the program.

717: Mandated Reporting of Child Abuse and Maltreatment

All Head Start and Early Head Start staff persons are "mandated reporters." As mandated reporters, staff members working for Head Start and Early Head Start programs are legally obligated to report suspected child abuse or neglect to the appropriate state child protection agency. GOBC requires all staff to complete 2-hour Mandated Reporter training and provide HR with a copy of the completed certificate, prior to working with children and families.

Staff persons are required to report incidents where there is a reasonable suspicion that abuse or neglect has occurred or there is a substantial risk that abuse or neglect may occur, either in the care of a Head Start agency or outside of the program. It is not the responsibility of the staff person or the program to investigate whether abuse or neglect actually occurred, but rather to report probable incidents.

In fact, programs and individuals must not attempt to investigate; to do so can jeopardize the accuracy of the official investigation conducted by child protective services. Any employee who is the subject of a reported case of abuse or neglect must be removed from contact with children during the state investigation and until the charge is fully resolved.

All Head Start programs have internal procedures in place for staff to report suspected cases of child abuse and neglect. Procedures include notification to the program's OCFS Syracuse Regional Office immediately when a staff member or volunteer causes an incident or suspected incident. Greater Opportunities provides training in methods for identifying and reporting suspected child abuse and neglect.

Head Start programs train staff, consultants, and volunteers that they are prohibited from engaging in corporal punishment, emotional or physical abuse, or humiliation of children at any time (45 CFR 1304.52(i)(1)(iv)).

718: Security Camera Policy Board Approved: 2/25/21

Greater Opportunities strives to maintain a safe and secure environment for its staff and customers. In pursuit of this objective, selected areas of the agency premises are equipped with video cameras that are recording at all times. Signage will be posted at the agency entrance disclosing this activity. The agency's video security system shall be used only for the protection and safety of customers, employees, assets, property, and to assist law enforcement.

Reasonable efforts shall be made to safeguard the privacy of customers and employees. Video cameras shall not be positioned in areas where there is a reasonable expectation of personal privacy such as restrooms; employee break or changing rooms. The video security cameras will be positioned to record only those areas specified by the CEO, and will complement other measures to maintain a safe and secure environment in compliance with agency policies. Camera locations shall not be changed or added without the permission of the CEO.

Only the CEO or employees designated by the CEO are authorized to operate the video security system. Access to video records shall be limited to authorized employees, who shall only access such records during the course of their regular duties. Agency employees are to review and comply with this policy. Such persons shall not violate any laws relevant to this policy in performing their duties and functions related to the video security system.

Images from the agency video security system are stored digitally on hardware in the agency. Any records produced by the video security system shall be kept in a secure manner, and managed appropriately by the agency to protect legal obligations and evidentiary values.

- Video records may be used to identify the person or persons responsible for agency policy violations, criminal activity, or actions considered disruptive to normal agency operations.
- Video records may be used to assist law enforcement agencies in accordance with applicable state and federal laws upon receipt of a subpoena. The requirement of a subpoena may, however, be waived by the CEO or authorized employees when appropriate. Video records of incidents can be retained and reviewed as long as considered necessary by the CEO.
- Video records may be shared with authorized employees when appropriate or, upon approval by the CEO, other agency staff to identify person(s) suspended from agency property and to maintain a safe, secure and policy-compliant environment.
- Video records may be used, upon authorization by the CEO, as otherwise allowed by law.

- Only the CEO and employees designated as Persons in Charge shall be authorized to release any video record to law enforcement. Only the CEO shall be authorized to release any video record to any third-party other than law enforcement.
- Video records shall not be used or disclosed other than as specifically authorized by this policy.
- Only the CEO or employees authorized by the CEO shall operate the video security system.

719: Hepatitis B Vaccination Board Approved: 10/26/22

Information will be provided to the Maintenance Staff on Hepatitis B vaccinations addressing its safety, benefits, efficacy, methods of administration and availability. The Hepatitis B Vaccination series will be made available at no cost within 10 days of initial assignment to employees who have occupational exposure to blood or other potentially infectious materials unless:

- The employee has previously received the series.
- Antibody testing reveals that the employee is immune.
- Medical reasons prevent taking the vaccination.
- The employee chooses not to obtain the vaccinations.

All employees are strongly encouraged to receive the Hepatitis B vaccination series; however, if an employee chooses to decline HB vaccination, the employee must sign a statement to this effect.
Employees who decline may request and obtain the vaccination at a later date at no cost. Documentation of refusal of the HB vaccination (see Appendix C1) will be kept in in Human Resources office with the employee's other medical records.

Post Exposure Evaluation and Follow- up and Procedures for Reporting, Documenting and Evaluating the Exposure.

7.1 Greater Opportunities will follow OSHA guidelines if an exposure incident occurs, the employee must contact their immediate supervisor and the Human Resources Director immediately. Each exposure must be documented by the employee on an "Accident Report Form". The Health Services Coordinator and the Human Resources Director will add any additional information as needed.
An immediately available confidential medical evaluation and follow-up will be conducted by Occupational Health. The following elements will be performed by hospital personnel:

- Document the routes of exposure and how exposure occurred.
- Identify and document the individual source, unless the employer can establish that identification is infeasible or prohibited by State or local law.
- Obtain consent and test course individual's blood as soon as possible to determine HIV, HBV, and HCV infectivity and document the source's blood test results.

720: GPS Tracking Policy

Board Approval: 5/22/24

Greater Opportunities for Broome and Chenango, Inc. (GOBC) vehicles are equipped with GPS tracking devices to help monitor vehicle and driver performance. To promote safe driving, we track driving behavior and monitor for vehicle maintenance issues. The GPS system will provide both real time and historical information which will be reviewed via the computer system. The system will monitor, at a minimum, if the device is plugged in, speed of vehicle at all times, sudden acceleration, and harsh braking to help improve safe driving practices. The intent of the GPS monitoring is not to punish employees, but to coach employees to better and safer driving behaviors.

Speeding in a Company Vehicle
Speeding in a company vehicle puts the driver, passengers, pedestrians, as well as other drivers at risk of harm. It also increases the risk of damage to a company vehicle. The aforementioned will lead to increased insurance costs to the company. It can also have a negative impact on GOBC's reputation in our communities. If an employee is determined to have been going 8 miles per hour or over posted speed limit, it will result in corrective action following the Greater Opportunities' Progressive Discipline Policy.

Motor Vehicle Accident
Employees who are involved in a motor vehicle accident while driving a company vehicle must report the incident to their supervisor. The employee may be subject to corrective action depending on the nature and severity of the accident, the employee's driving record, and the impact on the agency's reputation and liability. If injured, please contact Human Resources department as soon as possible after treatment.

Unauthorized Use of Company Vehicle
Employees who use a company vehicle for personal or unauthorized purposes, such as running errands or driving outside of work hours, will be subject to corrective action.

Compliance with Regulations and GPS Rules
Employees who drive company vehicles are expected to comply with all applicable laws and regulations related to the operation of motor vehicles, such as speed limits, traffic signs, seat belts, and cell phone use. Employees who drive agency vehicles are also required to follow GOBC's GPS rules, which monitor the location, speed, and route of the vehicle. The GPS trackers are installed for the safety and security of the employees and the agency.

Any violation of the regulations or GPS rules will result in corrective action. Corrective action will follow GOBC's Progressive Discipline Policy that consists of an employee receiving a verbal warning, written warning, suspension, and termination of employment.

NOTE: GOBC reserves the right, if management finds the employee's driving to be outrageous based on the road conditions or area in which the violation occurred, to terminate an employee even if the employee has not exhausted all corrective action measures leading up to termination.

SECTION 800: LEAVING GREATER OPPORTUNITIES, INC.

801: Progressive Discipline

Introduction
Progressive discipline is a process of correcting and improving employee behavior or performance through a series of increasingly graduated measures. The purpose of progressive discipline is to help employees understand and comply with the expectations and standards of the organization, and to provide them with an opportunity to correct their deficiencies. Progressive discipline is not intended to be punitive or adversarial, but rather to foster a positive and respectful work environment.
Scope and application
This policy applies to all employees of the organization, regardless of their position, status, or tenure. It does not apply to temporary, casual, or contract workers, or to volunteers. This policy also does not apply to situations that require immediate termination, such as gross misconduct, theft, fraud, violence, harassment, discrimination, or breach of confidentiality.

Principles and procedures
The following principles and procedures guide the implementation of progressive discipline:

- Progressive discipline is based on the principle of natural justice, which means that employees have the right to be informed of the allegations against them, to be heard and to present their side of the story, and to be treated fairly and impartially.
- Progressive discipline is also based on the principle of proportionality, which means that the disciplinary measures should match the severity and frequency of the employee's misconduct or inferior performance.
- Progressive discipline is a collaborative process that involves the employee, the manager, and the human resources department. The manager is responsible for identifying and documenting the employee's issues, communicating them to the employee, and providing feedback and coaching. The employee is responsible for acknowledging and addressing the issues and demonstrating improvement and commitment. The human resources department is responsible for providing guidance and support to the manager and the employee and ensuring that the policy is followed consistently and fairly.
- Progressive discipline follows a four-step process, which consists of: verbal warning, written warning, suspension, and termination. Each step is documented and signed by the manager and the employee and kept in the employee's file. The manager may skip or repeat a step, depending on the circumstances and the employee's response. The manager may also consult with the human resources department before taking any disciplinary action.
- Verbal warning: A verbal warning is the least severe step of progressive discipline. It is used to address minor or isolated incidents of misconduct or inferior performance, such as lateness, absenteeism, errors, or attitude problems. The manager should meet with the employee in private, explain the nature and impact of the issue, and ask the employee for their input and explanation. The manager should also clarify the expectations and standards of the organization and provide the employee with feedback and coaching on how to improve. The manager should inform the employee that this is a verbal warning, and that further disciplinary action may follow if the issue is

not resolved. The manager should document the verbal warning and forward a copy to HR for the employee's file.

- Written warning: A written warning is another step of progressive discipline. It is used to address more serious or repeated incidents of misconduct or inferior performance, or when a verbal warning has not resulted in improvement. The manager should meet with the employee in private, present them with a written warning that outlines the issue, the previous disciplinary action, the expected improvement, and the consequences of further violations. The manager should also provide the employee with feedback and coaching on how to improve and set a reasonable period for review. The manager should ask the employee to sign the written warning and forward a copy to HR for the employee's file. The employee may also attach a written response to the warning if they wish.
- Suspension: A suspension is a more graduated step of progressive discipline. It is used to address severe or persistent incidents of misconduct or inferior performance, or when a written warning has not resulted in improvement. A suspension is a temporary removal of the employee from the workplace, without pay, for a specified period of time. The manager should consult with the human resources department before suspending an employee and obtain the approval of the senior management. The manager should meet with the employee in private, inform them of the suspension, and provide them with a written notice that explains the reason, the duration, and the terms of the suspension. The manager should also inform the employee that this is the decisive step before termination, and that they must demonstrate significant improvement upon their return. The manager should document the suspension and forward a copy to HR for the employee's file.
- Termination: Termination is the last and most severe step of progressive discipline. It is used to end the employment relationship when all other disciplinary measures have failed, or when the employee has committed a serious breach of trust or a major violation of the organization's policies or values. The manager should consult with the human resources department and the senior management team before terminating an employee and ensure that there is sufficient evidence and documentation to support the decision. The manager and a witness should meet with the employee in private, inform them of the termination, and provide them with a written notice that states the reason, the effective date, and the final pay and benefits. The manager should also collect any organization's property from the employee, and escort them out of the premises. The manager should document the termination and forward a copy to HR for the employee's file.

Appeal and grievance.
Employees have the right to appeal or grieve any disciplinary action that they believe is unfair, unjust, or inconsistent with the policy. Employees should follow the organization's appeal or grievance procedure, which may involve submitting a written complaint to the human resources department, requesting a meeting with the manager or a higher authority, or seeking external mediation or arbitration. Employees should also be aware of their legal rights and obligations and seek independent advice if necessary.

802: Exit Interviews

Exit interviews with the Human Resources Department will be offered to all employees.

803: References and Employment Verification

All requests for confirmation of employment made by former employees are to be forwarded to Human Resources; only employment dates, and title will be verified.

804: Termination of Benefits

The Human Resources Director will provide the former employee information clarifying the termination of benefits, leave, COBRA, pension, etc.

Policies and Procedures

The Employee Handbook Policies and Procedures contained herein are applicable to all employees of Greater Opportunities, Inc. as adopted by the Board of Directors on 10/28/2020 and as revised on the date indicated. Policies and Procedures were revised and approved on 10/28/2020. The updated employee handbook is located on PAYCO under the Company Information tab.

These policies indicate the framework within which all personnel are expected to discharge their duties in meeting the goals and objectives of the programs and services provided by GOBC.

In the absence of an approved personnel policy for a delegate agency, the Policies and Procedures of GOBC shall be in effect. The personnel policies of a delegate agency must not conflict with those of the grantee and any special conditions due to the peculiar nature of the delegate agency should be indicated in the contract.

It is understood that nothing in this handbook or any other policy or communication changes the fact that employment is at-will, for an indefinite period, and employment termination may occur with or without notice or cause. These policies are not to be considered a contract of employment and do not limit the reasons for termination of the employment relationship.

Neither this handbook, nor any other GOBC communication and/or practice, creates an employment contract or guarantee of employment for any specific duration. GOBC reserves the right to make changes in content or application of its policies as it deems appropriate, and these changes may be implemented even if they have not been communicated, reprinted, or substituted in this handbook.

GOBC will comply with all federal and state laws; the policies stated herein shall always be superseded by federal or state law.

The Personnel Committee within the Board of Directors is responsible for all recommendations on personnel and equal opportunity involving the employees of GOBC, exclusive of those responsibilities assigned to the CEO.

Procedure for Amending Policies

The Employee Handbook is a publication of the Board of Directors and policies shall remain in effect until otherwise amended by the Board of Directors of Greater Opportunities, Inc. at an official meeting.

Any amendment shall be submitted to the Board of Directors and the Head Start Policy Council at least two weeks prior to meeting for them to thoroughly review the policy before they approve it. The Head Start Policy Council will have concurring power with the Board of Directors in regards to any amendment to the Policies.

These personnel policies may be amended modified or terminated at any time by GOBC, without the consent or prior knowledge of the employees. Any such modifications will be communicated in writing to all employees.

APPENDIX A

Greater Opportunities

Conflict of Interest Policy for Employees

The standard of behavior at Greater Opportunities (GOBC) is that all staff, and volunteers scrupulously avoid any conflict of interest between the interests of Greater Opportunities on one hand, and personal, professional, and business interests on the other. This includes avoiding conflicts of interest as well as perceptions of conflicts of interests.

I understand that the purposes of this policy are: to protect the integrity of GOBC decision-making process, to enable our constituencies to have confidence in our integrity, and to protect the integrity and reputation of volunteers, staff and directors.

Upon or before hiring, I will make a full, written disclosure of interests, relationships, and holdings that could potentially result in a conflict of interest. This written disclosure will be kept on file and it will be updated if it is appropriate.

In the course of business, I will disclose any interests in a transaction or decision where I, my family and / or my significant other, or close associates will receive benefit or gain. After disclosure, I understand that I may be asked to leave the room for the discussion.

Further, I agree that I will not take on responsibilities for clients related to my work that would change the essential nature of the work. Specifically, this includes, but is not limited to, becoming the Executor of a client’s estate, accepting a client’s Power of Attorney, Medical Power of Attorney, etc. I also agree not to knowingly place myself into a situation where I am a recipient of financial and material gain. In the event that I am, I will promptly contact my supervisor for consultation and resolution of the matter.

I also agree that any work, subject to copyright laws, which I may create in my capacity as an GOBC staff person, will be the sole and exclusive property of GOBC. I understand that this policy is meant to be a supplement to good judgment, and I will respect its spirit as well as its wording.

Employee’s Printed Name	*Position*
Employee’s Signature	*Date*

APPENDIX B

Greater Opportunities Code of Conduct & Pledge of Ethics for Staff

Policies

- Be aware of and fully abide by the constitution, bylaws and policies, both personnel and otherwise, of Greater Opportunities (GOBC).
- Ensure compliance of GOBC with all laws, regulations and contractual requirements
- Ensure your compliance, and the compliance of your respective program of GOBC with all personnel policies, personnel practices, laws, regulations and contractual requirements
- Respect, follow and fully support the duly made decisions of the CEO and your immediate supervisor.
- Respect the work and recommendations of your fellow employees.
- Work diligently to ensure that your Job duties are completed to the best of your ability.
- View and act towards the CEO as the chief executive officer with the sole responsibility for the day-to-day management of GOBC.

Informed Participation

- Keep well-informed of all matters pertinent to your employment relationship.
- Respect and follow the "chain of command" of GOBC.
- Act in ways which do not interfere with the duties of the CEO and your immediate supervisor or do not undermine his/her authority with staff members.

Conflict of Interest, Representation & Confidentiality

- Do not accept or seek, on behalf of self or any other person, any financial advantage or gain other than nominal value (as defined and determined by the IRS) which may be offered as a result of your position at GOBC.
- Maintain full confidentiality of information obtained as a result of your employment.
- Represent the best interests of GOBC as defined in your Job Description and the personnel policies of GOBC.
- Not use or otherwise relate one's employment with the promotion of partisan politics

Interpersonal

- Maintain open communication and an effective partnership with the CEO and your immediate supervisor.
- Listen carefully to, follow and respect the opinions of the CEO and your immediate supervisor.
- Be "solution focused", offering criticism in a constructive manner.

- Always work to develop and improve your knowledge and skills as an employee.

Certification

I, the undersigned, certify that I have read and understand the Code of Conduct of GOBC. I agree that my actions will fully comply with the statements and intent of the Code of Conduct. I affirm that I have taken any action contravenes the conflict-of-interest policies of the organization or impedes my ability to perform my job responsibilities.

____

Printed Name

____

Signature

____

Date