

<b>THE CHILDREN'S CENTER OF WAYNE COUNTY POLICY MANUAL</b>	
<b>Policy: Non-Discrimination Practices to Provide Service</b>	<b>#PS25 (2015)</b>
<b>Division/Program: Behavioral Health Services</b>	<b>Date: 09/19/2001</b>
<b>Policy Revision (If Applicable)</b>	<b>Date: 06/26/2019</b>
<b>Procedure Revision</b>	<b>Date: 08/25/2021</b>
<b>APPROVAL (Note: Enter N/A below, if area of approval is not required for this policy)</b>	
<b>Leadership and or ACT: Carlynn Nichols</b>	<b>Date: 08/25/2021</b>
<b>Chief Executive Officer: Debora Matthews</b>	<b>Date: 10/18/2021</b>
<b>Committee:</b>	<b>Date:</b>
<b>Quality:</b>	<b>Date:</b>
<b>Legal:</b>	<b>Date:</b>
<b>Board of Directors:</b>	<b>Date:</b>

**PURPOSE:**

The purpose of this policy is to highlight that discriminatory or oppressive behaviors are not tolerated by The Children's Center (TCC).

**POLICY:**

It is the policy of The Children's Center to prohibit client discrimination of any individual or group because the individual is unable to pay. There will be no discrimination because of race, religion, age, national origin, color, height, weight, marital status, genetic information, sex, sexual orientation, gender identity or expression, physical or mental disability, political beliefs, or disability.

**APPLICATION:**

This policy applies to all The Children's Center's (TCC) employees, TCC Independent Contractors, student interns, and volunteers, also known as staff.

**STANDARD/EXTERNAL REQUIREMENT:**

Council on Accreditation (COA) Governance (GOV 8)

Detroit Wayne Integrated Health Network (DWIHN) Treatment with Dignity and Respect policy

Michigan Department of Health and Human Services; Title XIX and Title XXI of the Social Security Act

Michigan Mental Health Code, P.A. 258 of 1974. As amended MCL 330.1704; MCL 330.1708; MCL 330.1711; MCL 330.1748

**DEFINITIONS:**

- **Age:** The length of time that a person has lived.

- **Board of Directors:** A member of the Board of Directors or a Committee of the Board of Directors of The Children's Center.
- **Disability:** A physical or mental condition that limits a person's movements, senses, or activities.
- **Employee:** An individual hired full-time or part-time to perform a service for salary or wages where the employer has a right to control the details of how the services are performed.
- **Ethnicity:** The fact or state of belonging to a social group that has a common national or cultural tradition.
- **Family Status:** The status of being related to another person by blood, marriage, or adoption.
- **Gender Expression:** External appearance of one's gender identity, usually expressed through behavior, clothing, haircut or voice, and which may or may not conform to socially defined behaviors and characteristics typically associated with being either masculine or feminine.
- **Gender Identity:** One's innermost concept of self as male, female, a blend of both or neither - how individuals perceive themselves and what they call themselves. One's gender identity can be the same or different from their sex assigned at birth.
- **Generational Status:** Refers to whether or not someone or their parents were born in the United States.
- **Income:** The amount of money or its equivalent received during a period of time in exchange for labor or services, from the sale of goods or property, or as profit from financial investments.
- **Language:** The collection of words and the rules of govern syntax and grammar that govern how words are supposed to be arranged in order to convey a particular meaning.
- **Nationality:** The status of belonging to a particular nation, whether by birth or naturalization.
- **Place of Birth:** The place where someone is born.

- **Political Affiliation:** An association with a set of ideas, principles, and morals of a political group.
- **Race:** A group of people thought to share certain distinctive physical characteristics, such as facial structure or skin color.
- **Religious Affiliation:** The self-identified association of a person with a religion, denomination, or sub-denominational religious group.
- **Sex:** The biological differences; chromosomes, hormonal profiles, internal and external sex organs.
- **Sexual Orientation:** An inherent or immutable enduring emotional, romantic, or sexual attraction to other people. Refers to the sex of those to whom one is sexually and romantically attracted to.
- **Student Intern:** An individual from an institution of higher learning assigned to a program, administration, or support service at The Children's Center.
- **TCC Independent Contractor:** Individuals hired by TCC to perform specific duties that the organization has determined are allowable to be paid as an independent professional rather than an employee. The payer has the right to control or direct only the result of the work and not what will be done and how it will be done.
- **Volunteer:** An individual who volunteers services to The Children's Center without financial remuneration.

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**PROCEDURES:**

This policy will ensure that:

1. Individuals who receive services from The Children's Center are valued participants who have opportunities to shape and evaluate our programs through client satisfaction surveys.
2. Services are delivered in such a way that systemic barriers are eliminated.
3. Services are provided with sensitivity to the influence of power and privilege in service relationships and are delivered in keeping with anti-oppression principles.
4. Communication materials present a positive and balanced portrayal of people's diverse experiences.

**Reporting Responsibility:**

It is the responsibility of all TCC Board members, employees, contractors, sub-contractors, volunteers, student interns, and other persons acting on behalf of The Children's Center to report violations or suspected violations in accordance with this Non-Discrimination Policy.

**No Retaliation:**

No staff or other persons acting on behalf of The Children's Center who in good faith reports a violation of this policy will suffer harassment, retaliation, or adverse employment consequence.

**Reporting Violations:**

1. In most cases, a staff's supervisor is in the best position to address an area of concern. However, if you are not comfortable speaking with your supervisor or you are not satisfied with your supervisor's response, you are encouraged to speak with a manager, any member of the Leadership Team whom you are comfortable in approaching, or the Chief Compliance and Revenue Officer.
2. TCC Board members may report suspected acts of discrimination to the Chief Compliance and Revenue Officer.
3. Supervisors and managers are required to report suspected acts of discrimination to the Compliance Officer, who has a specific and exclusive responsibility to investigate all reported violations.

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**Acting in Good Faith:**

1. Anyone filing a complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information prior to disclosure.
2. Any allegation that proves not to be substantiated and proves to have been made maliciously or knowingly to be false will be viewed as a serious offense subject to disciplinary action and/or dismissal from one's position.

**Confidentiality:**

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

**Compliance Officer:**

1. The Compliance Officer is responsible for investigating and resolving all reported complaints and allegations and will advise the President & CEO, unless the complaint is against the President & CEO, in which case the Board of Directors Chair will be advised.
2. The Compliance Officer at the direction of the President & CEO will advise the Administrative Compliance Team (ACT), Board of Directors, or other relevant parties of the complaint. The Compliance Officer has direct access to the President & CEO and will be available to the Board of Directors, as they shall determine.

**Handling of Reported Violations:**

1. The Compliance Officer will notify the sender and acknowledge receipt of the reported violation or suspected violation within five business days.
2. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.
3. An individual who retaliates against someone who has reported a violation in good faith is subject to dismissal from their position including termination of employment.

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4. If TCC staff believe that they are not able to effectively perform services to a client based on the above definitions, then the individual must follow the procedures outlined in the Transfer of Clients Policy.

**FORMS:**

**SUPPLEMENTAL INFORMATION:**

TCC's Transfer of Clients Policy

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The Children's Center

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