



NON-DISCRIMINATION, HARASSMENT AND INTIMIDATION POLICY



**NON-DISCRIMINATION, HARASSMENT, INTIMIDATION,
EQUITY, AND INCLUSION POLICY**

DIVERSITY,

POLICY STATEMENT

Effective Date: April 1, 2020

Last Revised: April 1, 2026

Next Review Date: April 1, 2027

Katy Cares, Inc. (hereinafter "Katy Cares" or "the Organization") is committed to fostering an inclusive, diverse, equitable, and welcoming environment for all individuals associated with our mission—including board members, staff, volunteers, clients, program participants, donors, vendors, contractors, and community partners.

Katy Cares affirms that every person deserves dignity, respect, and equal treatment regardless of race, color, national origin, ethnicity, ancestry, language, culture, religion, creed, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, family status, pregnancy, parental status, veteran or military status, genetic information, disability (physical, mental, or developmental), neurodiversity, socioeconomic status, educational background, political affiliation, or any other characteristic protected by applicable federal, state, or local law.

We stand firmly against all forms of discrimination, harassment, intimidation, retaliation, and bias. Our commitment extends to every aspect of our operations—from employment practices to service delivery, from vendor selection to community engagement.



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1. SCOPE AND APPLICATION

This policy applies to:

Internal Operations:

- Recruitment, hiring, compensation, promotion, training, and termination of employees, staff, and independent contractors.
- Selection, orientation, and management of volunteers
- Board member nomination, election, and service
- Day-to-day organizational operations and decision-making
- Workplace environment and professional conduct
- Delivery of all trauma-informed therapeutic programs and services

External Relations:

- Client intake, enrollment, and participation in all programs
- Delivery of services, support, and assistance to clients and program participants
- Selection and management of consultants, vendors, contractors, suppliers, and service providers
- Partnerships with community organizations, churches, and stakeholders
- Donor relations and fundraising activities
- Public communications and community representation

All Settings:

- Physical locations (offices, residential facilities, program sites)



- Virtual environments (video conferences, online platforms, email communications)
 - Organization-sponsored events (fundraisers, trainings, community gatherings)
 - Third-party locations where the Organization conducts its business.
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2. EQUAL OPPORTUNITY AND NON-DISCRIMINATION

Employment Practices

Katy Cares provides equal employment opportunity in all aspects of employment, including:

- Recruitment, application, and hiring processes
- Compensation, benefits, and leave policies
- Job assignments, transfers, and promotions
- Training, professional development, and educational opportunities
- Performance evaluations and disciplinary actions
- Termination and reduction-in-force decisions

All employment decisions are based solely on merit, qualifications, performance, and organizational needs—never on protected characteristics.

Program Access and Service Delivery

Katy Cares ensures equal access to all programs and services:

- Client intake and enrollment processes are conducted without discrimination
- Program participation requirements are applied consistently and fairly
- Therapeutic services are delivered with cultural competence and sensitivity
- Accommodations are provided for individuals with disabilities
- Language access services are available when needed
- Services are trauma-informed and recognize intersectional identities

Vendor and Contractor Relations

Katy Cares conducts procurement and vendor management without bias:

- Selection criteria focus on quality, value, and alignment with mission
- Contracting processes are transparent and equitable
- Vendor diversity is encouraged and valued
- Performance evaluations are objective and fair



3. PROHIBITED CONDUCT

Katy Cares strictly prohibits the following behaviors by or toward any person associated with the Organization:

Discrimination

Treating individuals or groups differently, less favorably, or unequally based on protected characteristics, including but not limited to:

- Denying opportunities, services, or benefits
- Applying different standards or requirements
- Creating barriers to access or participation
- Making decisions based on stereotypes or assumptions
- Engaging in disparate treatment or creating disparate impact

Harassment

Unwelcome conduct based on protected characteristics that creates a hostile, intimidating, or offensive environment, including:

Verbal Harassment:

- Derogatory comments, slurs, epithets, or jokes
- Offensive remarks about appearance, accent, or background
- Unwanted questions about personal characteristics
- Threats, insults, or verbal abuse
- Demeaning or patronizing language

Physical Harassment:

- Unwanted touching, blocking movement, or physical intimidation
- Assault or threats of physical harm
- Destruction of personal property
- Gestures or physical conduct that is offensive or threatening

Visual Harassment:

- Display of offensive images, symbols, or materials
- Offensive gestures or body language
- Inappropriate staring or leering



Digital/Electronic Harassment:

- Offensive emails, texts, or social media messages
- Cyberbullying or online intimidation
- Sharing offensive content through digital platforms

Sexual Harassment:

- Unwelcome sexual advances, requests for sexual favors, or other verbal/physical conduct of a sexual nature
- Sexual comments, jokes, or innuendos
- Display of sexually explicit materials
- Unwanted physical contact of a sexual nature
- Quid pro quo harassment (conditioning benefits on sexual favors)

Intimidation

Using fear, threats, or coercion to control, silence, or influence others, including:

- Threatening adverse consequences for reporting discrimination or harassment
- Using position, power, or authority to create fear
- Stalking or following individuals
- Making threatening statements or gestures
- Creating an atmosphere of fear or anxiety

Retaliation

Taking adverse action against someone for:

- Reporting discrimination, harassment, or intimidation
- Participating in an investigation or inquiry
- Opposing discriminatory practices
- Supporting someone who has made a complaint
- Requesting accommodations for a disability

Retaliation includes, but is not limited to:

- Termination, demotion, or denial of promotion
- Reduction in hours, benefits, or responsibilities
- Unfavorable work assignments or performance evaluations
- Exclusion from meetings, trainings, or opportunities
- Spreading rumors or damaging someone's reputation
- Creating a hostile environment for the complainant



Microaggressions

While addressing overt discrimination, we also recognize the harm caused by subtle forms of bias, including:

- Comments or actions that communicate negative or derogatory messages
 - Assumptions about abilities, background, or experiences based on identity
 - Exclusion from conversations, meetings, or opportunities
 - Tokenism, or treating individuals as representatives of their group
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4. AFFIRMATIVE COMMITMENTS TO DIVERSITY, EQUITY, AND INCLUSION

Beyond preventing discrimination, Katy Cares actively promotes diversity, equity, and inclusion through:

Diversity:

- Actively recruiting board members, staff, and volunteers from diverse backgrounds
- Cultivating diverse vendor and contractor relationships
- Celebrating cultural diversity through programming and events
- Recognizing and honoring different perspectives, experiences, and traditions
- Ensuring diverse representation in organizational leadership and decision-making

Equity:

- Examining policies and practices for unintended barriers or bias
- Providing resources and support to address systemic inequities
- Ensuring fair and just distribution of opportunities and resources
- Recognizing that treating everyone "the same" may not produce equitable outcomes
- Implementing practices that address historical and structural disadvantages

Inclusion:

- Creating environments where all feel welcomed, respected, and valued
- Soliciting and incorporating diverse perspectives in decision-making
- Ensuring accessible physical and virtual spaces
- Using inclusive language in all communications
- Providing cultural competency training for staff and volunteers
- Building authentic relationships with diverse communities



5. REASONABLE ACCOMMODATIONS

Disability Accommodations

Katy Cares provides reasonable accommodations for qualified individuals with disabilities to ensure equal opportunity in employment and equal access to programs and services, unless doing so would create undue hardship.

Accommodation Process:

1. Individual requests accommodation in writing or verbally
2. The Organization engages in interactive dialogue to identify effective accommodations
3. Medical documentation may be requested when appropriate
4. Accommodation is implemented promptly
5. Accommodation effectiveness is monitored and adjusted as needed

Examples of accommodations include:

- Modified work schedules or environments
- Assistive technology or equipment
- Modified program delivery methods
- Sign language interpreters or communication aids
- Accessible facilities and materials

Religious Accommodations

Katy Cares reasonably accommodates sincerely held religious beliefs and practices in employment and program participation, unless doing so would create undue hardship. This includes accommodation for religious observances, practices, and dress.

Pregnancy and Parenting Accommodations

Katy Cares provides accommodations for pregnancy, childbirth, and related medical conditions, as well as for lactation needs, consistent with applicable law.



6. REPORTING PROCEDURES

How to Report

Any individual who experiences or witnesses discrimination, harassment, intimidation, or retaliation should report the conduct promptly through any of the following channels:

Primary Contact: Chairman of the Board of Directors [Contact information]

Alternative Contacts: Executive Director/President [Contact information]

Any Board Member, Any Supervisor or Manager

Anonymous Reporting: [If available: Anonymous hotline or online reporting system]

What to Include in a Report

While not required, the following information is helpful:

- Name and contact information (if not anonymous)
- Description of the incident(s), including dates, times, and locations
- Names of individuals involved (perpetrator and witnesses)
- Any documentation or evidence (emails, texts, photos, etc.)
- Impact of the conduct
- Any prior incidents or reports

Confidentiality

Reports will be handled with discretion and confidentiality to the extent possible while conducting a thorough investigation. Information will be shared only on a need-to-know basis with individuals involved in the investigation and resolution process.

No Retaliation

Katy Cares strictly prohibits retaliation against anyone who:

- Reports discrimination, harassment, intimidation, or other policy violations
- Participates in an investigation
- Opposes discriminatory practices
- Requests reasonable accommodations



Retaliation itself is a serious policy violation subject to disciplinary action up to and including termination, removal from programs, or termination of contracts.

7. INVESTIGATION AND RESOLUTION

Investigation Process

Upon receiving a report, Katy Cares will:

1. **Acknowledge Receipt:** Confirm receipt of the complaint within 2 business days
2. **Conduct Prompt Investigation:** Begin investigation within 5 business days
3. **Maintain Impartiality:** Assign the investigation to a neutral party without a conflict of interest
4. **Gather Information:** Interview complainant, accused party, and witnesses; review documents and evidence
5. **Document Findings:** Create a written record of the investigation process and findings
6. **Make Determination:** Determine whether a policy violation occurred based on the preponderance of evidence
7. **Communicate Outcome:** Notify parties of outcome (while maintaining appropriate confidentiality)
8. **Take Corrective Action:** Implement appropriate remedial and/or disciplinary measures

Timeline: Investigations will generally be completed within 30 days, though complex cases may require additional time. Parties will be notified of any delays.

Interim Measures

During investigation, Katy Cares may implement interim measures to ensure safety and prevent further harm, including:

- Temporary separation of parties
- Modified work arrangements or program schedules
- Temporary suspension with or without pay (as appropriate)
- No-contact directives
- Increased monitoring or supervision

Standard of Evidence

Determinations will be made based on a "preponderance of evidence" standard—meaning it is more likely than not that a policy violation occurred.



8. CONSEQUENCES AND CORRECTIVE ACTION

For Policy Violations

Individuals found to have violated this policy will face consequences appropriate to the severity and frequency of the violation, which may include:

Employees/Staff:

- Verbal or written warning
- Mandatory training or counseling
- Loss of privileges or responsibilities
- Suspension without pay
- Demotion
- Termination of employment

Volunteers:

- Verbal or written warning
- Mandatory training
- Removal from specific roles or activities
- Termination of the volunteer relationship

Board Members:

- Verbal or written warning
- Censure
- Removal from committees or leadership positions
- Removal from Board

Program Participants/Clients:

- Verbal or written warning
- Behavioral contract or corrective action plan
- Temporary suspension from programs or services
- Termination of services
- Removal from residential programs
- Permanent ban from Organization programs

Vendors/Contractors:

- Warning and corrective action plan



- Termination of contract
- Placement on the do-not-hire list

Remedial Measures

In addition to disciplinary action, Katy Cares may implement remedial measures to address the impact of violations and prevent recurrence:

- Policy review and revision
 - Organization-wide or targeted training
 - Enhanced monitoring and oversight
 - Environmental changes (physical or procedural)
 - Support services for affected individuals
 - Restorative practices, when appropriate
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9. FALSE REPORTS

While Katy Cares encourages good-faith reporting and recognizes that not all allegations can be substantiated, **knowingly making false accusations is a serious matter** and may result in disciplinary action. However, a finding that a policy violation did not occur does not automatically mean the report was false or made in bad faith.

10. TRAINING AND EDUCATION

Katy Cares is committed to preventing discrimination and harassment through education:

- **All employees, board members, and volunteers** receive training on this policy during orientation and annually thereafter
- **Supervisors and managers** receive additional training to recognize, prevent, and address discrimination and harassment.
- **All individuals** associated with the Organization are expected to familiarize themselves with this policy.
- **Training topics** include recognizing bias, bystander intervention, cultural competency, trauma-informed approaches, and creating inclusive environments.



11. POLICY REVIEW AND UPDATES

This policy will be reviewed annually and updated as needed to:

- Reflect changes in federal, state, and local law
 - Incorporate best practices in diversity, equity, and inclusion
 - Address emerging issues or concerns
 - Improve effectiveness based on implementation experience
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12. LEGAL COMPLIANCE

This policy is designed to comply with applicable federal, state, and local laws, including but not limited to:

- Title VII of the Civil Rights Act of 1964
- Americans with Disabilities Act (ADA)
- Age Discrimination in Employment Act (ADEA)
- Pregnancy Discrimination Act
- Genetic Information Non-discrimination Act (GINA)
- Texas Labor Code Chapter 21 (Texas Commission on Human Rights Act)
- Fair Housing Act (applicable to residential programs)
- Equal Credit Opportunity Act
- Other applicable federal, state, and local anti-discrimination laws

Nothing in this policy limits rights or remedies available under applicable law. Individuals retain the right to file complaints with external agencies, including:

- Equal Employment Opportunity Commission (EEOC)
- Texas Workforce Commission Civil Rights Division
- U.S. Department of Housing and Urban Development (HUD)
- Other applicable federal, state, or local agencies



13. DEFINITIONS

Discrimination

Treating a person or group less favorably or differently based on protected characteristics. Discrimination can be:

- **Direct:** Overtly treating someone differently based on a protected characteristic
- **Indirect:** Applying seemingly neutral policies that disproportionately disadvantage protected groups
- **Systemic:** Patterns, practices, or policies embedded in organizational structures that create disadvantage

Harassment

Unwelcome conduct based on protected characteristics that is severe or pervasive enough to create a hostile, intimidating, or offensive environment. Harassment can include verbal, physical, visual, or electronic conduct. A single severe incident may constitute harassment, or a pattern of less severe incidents may collectively create harassment.

Hostile Environment

An environment in which discrimination or harassment is sufficiently severe or pervasive to alter the conditions of employment or program participation and create an abusive atmosphere.

Intimidation

Behavior intended to frighten, coerce, or deter someone through threats, displays of aggression, or abuse of power. Intimidation creates fear and interferes with a person's ability to perform their job, participate in programs, or exercise their rights.

Retaliation

Adverse action taken against someone for engaging in protected activity (reporting discrimination, participating in investigations, opposing discriminatory practices). Retaliation can be obvious (termination, demotion) or subtle (exclusion, unfavorable assignments, hostile treatment).

Microaggression

Brief, commonplace verbal, behavioral, or environmental indignities (whether intentional or unintentional) that communicate hostile, derogatory, or negative messages about stigmatized or



marginalized groups. While individual microaggressions may seem minor, their cumulative effect can create hostile environments.

Protected Characteristics

Personal attributes protected from discrimination by law or organizational policy, including but not limited to: race, color, national origin, ethnicity, ancestry, citizenship, immigration status, language, culture, religion, creed, age, sex, gender, gender identity, gender expression, sexual orientation, marital status, family status, pregnancy, parental status, veteran/military status, genetic information, disability, neurodiversity, socioeconomic status, educational background, political affiliation, and any other characteristic protected by applicable law.

Reasonable Accommodation

Modifications or adjustments to jobs, work environments, programs, or services that enable qualified individuals with disabilities or sincerely held religious beliefs to participate fully, unless such accommodation would create undue hardship for the Organization.

Undue Hardship

Significant difficulty or expense that would fundamentally alter the nature of the Organization's operations, considering factors such as cost, resources, organizational size, and impact on operations.

Diversity

The presence of differences within a group encompasses visible and invisible identities, backgrounds, perspectives, and experiences. Diversity includes but is not limited to race, ethnicity, gender, age, religion, disability, sexual orientation, education, national origin, and socioeconomic status.

Equity

Fair treatment, access, opportunity, and advancement for all people, while striving to identify and eliminate barriers that have prevented full participation of historically marginalized groups. Equity recognizes that different people have different needs and circumstances, and achieving equality of outcome may require different approaches.

Inclusion

The practice of ensuring that all people feel welcomed, respected, supported, valued, and able to participate fully. Inclusion means that diverse perspectives are solicited, heard, and incorporated



into decision-making and that all individuals can bring their authentic selves to their engagement with the Organization.

Cultural Competence

The ability to understand, appreciate, and interact effectively with people from diverse cultures, beliefs, and backgrounds. Cultural competence requires awareness of one's own cultural worldview, knowledge of different cultural practices and worldviews, and cross-cultural skills.

Intersectionality

The interconnected nature of social categorizations such as race, class, gender, sexual orientation, and disability can create overlapping and interdependent systems of discrimination or disadvantage. Individuals may experience discrimination or marginalization based on multiple aspects of their identity simultaneously.

14. POLICY ADOPTION

This policy was adopted by the Board of Directors of Katy Cares, Inc. on the date indicated below.

A handwritten signature in black ink that reads "Jerry Edmonson".

Chairman: Board of Directors
Dr. Jerry Edmonson

A handwritten signature in black ink that reads "Dawid J Pieterse".

President: Executive Director
Dr. Dawid J Pieterse

Effective Date: April 1, 2020

Last Revised: April 1, 2026

Next Review Date: April 1, 2027

Katy Cares, Inc. is committed to creating and maintaining an environment where every person is treated with dignity, respect, and equity. This policy reflects our values and our legal obligations. Together, we build a more inclusive and welcoming Organization and community.