



SEVEN MILE ROAD

# HUMAN RESOURCES POLICY

Updated September 2013

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## **SEVEN MILE ROAD OVERVIEW**

Seven Mile Road is a gospel-centered missional church committed to the advance of the gospel in Greater Boston. Seven Mile Road has planted two churches, Seven Mile Road Philadelphia and Restoration Road in Wakefield, MA. In the next ten years, our aim is to multiply local Seven Mile Roads in Greater Boston, working together and sharing resources, towards the end of seeing 1500 Bostonians believing the gospel, being disciplined, and living on mission in an ever-growing network of healthy Seven Mile Roads for Jesus' glory and our joy.

### ***DISTINCTIVES***

Seven Mile Road is a gospel-centered church that is:

- Deeply Relational - Our goal is for Seven Mile Road to be a church where friendships run deep and our shared culture is different than anything that our unbelieving friends have ever seen before, one that enables trust, accountability, and a connectedness that moves us from being individuals to being a community.
- Contextually "Bostonian" - We desire to be a church where Bostonians who don't know Jesus at all can spend time and not stumble over anything but Jesus' gospel.
- Locally Missional - Rather than focusing regionally, we want every local Seven Mile Road church to know and be known by a specific people group that's theirs.
- Theologically Reformed - Seven Mile Road holds to the Reformed understanding of the gospel that salvation is by grace alone, through faith alone, in Christ alone, all for the glory of God alone.
- Happily Complementarian - We happily embrace scripture's teaching around the doctrine of man and excitedly call our men and women to embrace their manhood and womanhood by faith, including calling men to serve our flock as pastors as our Father intended.
- Aggressively Multiplying - Seven Mile Road is not out to become a mega-church, but to multiply healthy congregations that grow roots

in particular Boston zip codes and live with missional intentionality among those people groups.

***ELDERS***

Justin Gottlieb, Executive Pastor  
Dan Ko, Local Lead Pastor Malden  
Matthew Kruse, Lead Pastor and Local Lead Pastor Melrose  
Matthew Moran, Gospel Communities Pastor

***CENTRAL OFFICES***

Seven Mile Road Church  
84 Green Street  
Melrose, MA 02176  
781.313.3421  
[www.sevenmileroad.org](http://www.sevenmileroad.org)

***OTHER INFORMATION***

Employer ID No.: 20-4192247

## **EMPLOYMENT**

### ***AT WILL EMPLOYMENT***

Employment at Seven Mile Road is “at-will”, meaning that the terms of employment may be changed with or without notice, or without cause, including but not limited to termination, demotion, promotion, compensation, benefits, duties, and location of work. Entrance into employment with Seven Mile Road is voluntary and done with acknowledgement that there is no agreement or contract expressed or implied between Seven Mile Road and the employee for continuing or long-term employment.

While the administrator has certain hiring authority, no representative of Seven Mile Road has any authority to alter the at-will nature of this employment relationship. Similarly, nothing stated in these or other Seven Mile Road policies shall be interpreted to conflict, alter, or eliminate the “at-will” status of Seven Mile Road employees.

### ***EQUAL OPPORTUNITY EMPLOYMENT***

Seven Mile Road is an equal opportunity employer. Excepting Bona Fide Occupational Qualification or legal exemption (i.e. our commitment to biblical teaching on religion, gender, sexual orientation, etc.), Seven Mile Road will abide by all state and federal laws prohibiting discrimination against applicants and employees on the basis of race, color, national origin, age, disability, status with regard to public assistance, or other legally protected status category. All employment decisions will be based on character, spiritual fitness, and job qualifications.

Seven Mile Road expects all employees to understand, obey, and strictly enforce this policy, including the reporting of any and all unlawful discrimination to a Pastor. Any employee engaging in any form of unlawful discrimination will be subject to disciplinary action, up to and including termination of employment.

## ***FAIR LABOR STANDARDS ACT***

In accordance with the Fair Labor Standards Act (FLSA), all Seven Mile Road positions will be evaluated and categorized into its appropriate status: exempt or non-exempt. This will be communicated clearly to the employee and supervisor to ensure employees receive appropriate protection and compensation.

Employees *exempt* from FLSA, are not protected by its minimum pay or overtime standards. Exempt employees are salaried and are expected to work as needed for their job responsibilities, but will, under some circumstances, be granted compensatory time off at a later date.

Employees that are non-exempt from FLSA, will be paid an hourly rate no less than that set by the Commonwealth of Massachusetts and will receive overtime pay of one and a half times regular pay for any time worked above forty hours in a work week. Vacation, sick, and holiday, etc. hours are not included in the calculation of overtime pay.

Exemption status will be noted in each job description Seven Mile Road. When necessary, additional clarity around hours worked, scheduling, and location of work will be determined by the employees supervisor.

## ***THEOLOGICAL AGREEMENT***

Employment at Seven Mile Road assumes employee is, or will soon be, a covenanted member at Seven Mile Road, fulfilling all covenantal obligations and agreeing with core theological positions of Seven Mile Road as stated in the Seven Mile Road *Statement of Faith*.

## ***BACKGROUND CHECKS***

For the safety of Seven Mile Road, her members, participants and our surrounding communities, Seven Mile Road reserves the right to conduct employee background checks prior to and/or after any offer or beginning

of employment. In addition to any other background checks, Seven Mile Road conducts CORI checks on all employees and volunteers each year.

### ***PAYCHECKS***

Employees are paid by direct deposit on or near the tenth of each month. Pay is for the entirety of the current month.

### ***CONFLICT OF INTEREST***

Employees must review and abide by Seven Mile Road's Conflict of Interest Policy. See *Appendix 1*.

### ***SEXUAL HARASSMENT POLICY***

Sexual harassment of any type is prohibited. Employees must review and abide by Seven Mile Road's Sexual Harassment Policy. See *Appendix 2*.

### ***MANDATORY REPORTING***

All Pastors of Seven Mile Road, along with anyone working in Seven Mile Kids or with anyone under the age of eighteen, are Mandatory Reporters as defined by Massachusetts State Law.

According to Massachusetts State Ann. Laws Ch. 119, § 51A, "If you have reasonable cause to believe that a child is suffering from or has died as a result of abuse or neglect, you are required by law to report it. Abuse and neglect is defined as follows:

- Abuse inflicted upon him or her that causes harm or substantial risk of harm to the child's health or welfare, including sexual abuse
- Neglect, including malnutrition

- Being a sexually exploited child
- Being a human trafficking victim”

This is to protect, serve, and minister to those abused or neglected and also to protect, serve, and minister to the reporter and anyone affected.”

The reporting process is as follows:

1. Mandatory reporter submits an oral report IMMEDIATELY to someone on the Pastoral Team.
2. The pastor files an immediate ORAL report with the Department of Children and Families.
3. The pastor files a WRITTEN report with the Department of Children and Families within 48 hours of the initial report.
4. Pastor will notify parents of report.
5. Be available for any follow up questions.

The church will take immediate measures to protect, counsel, minister, and serve anyone who has been affected by abuse or neglect. The first step is to take the proper legal action. For more information, you can visit [www.mass.gov/dcf](http://www.mass.gov/dcf).

## ***BLAMELESSNESS***

In addition to an ongoing commitment to the covenantal obligations of members of Seven Mile Road, employees of Seven Mile Road must be committed to blamelessness in their personal and business dealings. This pursuit of blamelessness should be evidenced by intentional avoidance of morally compromising situations at all times. Violation of these expectations may subject employee to disciplinary action up to, and including, termination.

## ***CONFIDENTIALITY***

Seven Mile Road employees may have access to confidential information that could be harmful to the church, her members, and others in the

community should it be shared inappropriately. Any breach of confidentiality may lead to discipline up to and including termination.

Any information that is confidential while employed at Seven Mile Road will remain so even after termination.

## **BENEFITS**

### ***HEALTH CARE COVERAGE***

Seven Mile Road provides health care coverage for eligible employees. Plan costs are reviewed on an annual basis by the Executive Pastor. Any changes recommended by the Executive Pastor will be reviewed by our Elder Board.

*Harvard Pilgrim Healthcare* is Seven Mile Road's current provider of health coverage.

### ***WORKERS' COMPENSATION***

Seven Mile Road carries Workers' Compensation Insurance that provides coverage for certain injuries or illnesses that are caused by, arise from, or occur while fulfilling job responsibilities at Seven Mile Road. Injured employees should report their work-related injury or illness to Pastor Justin Gottlieb immediately.

### ***VACATION AND HOLIDAY PAY***

Seven Mile Road grants employees vacation and personal days, as well as a number of holidays listed below. Vacation and personal days are managed in a calendar year cycle and can be taken in full day (8 hour) or half-day (4 hour) increments.

Vacation Days:

- FT employees receive paid vacation days based on their position within the organization. Pastors receive fifteen vacation days. All other FT staff receive ten days.
- For new FT employees, vacation days are pro-rated based on date of hire.
- Employees are encouraged to take eligible vacation days each year. There is no rollover into the next calendar year.

- The employee's supervisor (with Executive Pastor approval) may increase the number of vacation days as employee responsibilities are increased.
- There is no compensation for unused vacation days, except upon retirement or termination of work at Seven Mile Road. Payment will be pro-rated based on termination date.
- Vacation must be requested two weeks prior to planned vacation and will be approved/declined by Executive Pastor.

#### Personal Days:

- Employees receive five personal days per calendar year, which may be used for vacation.
- For new employees, personal days are pro-rated based on date of hire.
- There is no rollover of personal days to the next calendar year.
- There is no compensation for unused personal days.

Seven Mile Road provides the following paid holidays for FT employees each year:

- Patriots Day
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving and day after
- Christmas Day through New Year's Day (except Sunday)

## ***LEAVE OF ABSENCE***

### **Sick Leave**

Full-time employees are provided eight hours per calendar month of sick hours. The balance of unused, accrued sick hours can be carried over to the next calendar year, up to a maximum of 240 hours. Accumulation in excess of this amount as of January 1 of each year shall be forfeited.

**Military Leave**

Military leave will be granted according to federal law.

**Bereavement Leave**

Upon the death of immediate family, employees are allowed three days of bereavement leave. Additionally, sick days and personal days can be used towards this end.

## **GUIDELINES**

### ***TIME SHEETS***

All non-exempt employees are required to record the actual number of hours worked and report to their supervisor through a designated system. Payment of overtime will be in accordance with all necessary laws.

It is expected that nonexempt employees will work only their regularly scheduled hours. The employee's supervisor must pre-approve all hours beyond their regular schedule.

### ***DRESS CODE***

Employee dress should be clean and free from characteristics that may hinder the work of the employee or the mission of Seven Mile Road. In particular, any clothing potentially harmful to a gospel brother or sister should be avoided. Examples of items employees should refrain from wearing:

- Revealing, tight, or suggestive clothing.
- Clothing supportive of any political party, message, or position.
- Clothing supporting any illegal or immoral behavior.

### ***CREDIT CARD***

Seven Mile Road credit card use is restricted to purchases for Seven Mile Road. Use of a Seven Mile Road card for personal purchases, even when reimbursement is intended is prohibited.

Submission of receipts via online form is required within 10 days of purchase.

## ***PROXIMITY TO CHURCH***

Seven Mile Road's mission, strategy, and vision require employees that are excited about the local church's mission and their own involvement in that mission. Employees of Seven Mile Road are to embrace and model missional living for all to see. Because of this, employees are expected to live within a strategic area that allows for intentional missional engagement with their local Seven Mile Road's target area/people group. Except for exceptional cases (e.g. Future Seven Mile Road plant/mission, already living in a nearby community, etc.) approved by the Seven Mile Road Pastor Team, this means that employees of Seven Mile Road are to live within the city limits of their local Seven Mile Road.

## ***REIMBURSEMENTS***

Any purchase needing reimbursement must be pre-approved by the Executive Pastor. Approval of reimbursement will only be granted when no other payment option is available. Request for reimbursement should be made within 10 days via appropriate online form.

## ***WORKING FROM HOME***

At Seven Mile Road, we are most concerned that our employees are functioning most happily, holily, and effectively. The relational nature of our work demands availability for meetings and other events, but otherwise employees are allowed flexibility in working hours and location at the discretion of their supervisor. Any negative effect of working away from the office will lead to revocation of "work from home" privileges.

## ***SOCIAL MEDIA***

Seven Mile Road recognizes the benefit of social media in our day and encourages employees to take advantage of these outlets (twitter,

Facebook, etc.) for the good of the gospel, community, and other positive purposes. That said, social media should never take away from time, energy, and effort from one's responsibilities at Seven Mile Road. Additionally, any web presence should not in any way damage, harm, or make difficult the ministry of Seven Mile Road. Toward that end, we have developed these guidelines:

- Notify the Executive Pastor of any blog, social media, or website you own, host, or create content for.
- Include a disclaimer on any blog or website making clear that the views are your own personal opinions and not those of Seven Mile Road.
- Be wise as you write and publish to the Internet, realizing the public nature and visibility of the platform and the potential for adverse consequences.
- Avoid publication of any material that would jeopardize the ministry of Seven Mile Road, her people, her employees, or your own job.

Unless approved otherwise by Seven Mile Road's Pastor Team, Seven Mile Road owns the copyrights to all work produced by employees within the scope of his/her employment at Seven Mile Road. This includes all sermons, writings, graphic design, artwork, songs, etc.

## ***JOB DESCRIPTIONS***

Seven Mile Road is committed to creating and maintaining accurate job descriptions for all positions with the following hopes:

- Clarity regarding expectations of the role
- Aiding the hiring process
- Evaluating performance
- Alignment of resources with the mission of Seven Mile Road.

Job descriptions are prepared upon the creation of a new position and updated on an annual basis. Employees are expected to aid in the process of making sure a job descriptions accurately reflect the work being done.

It is highly unlikely that job descriptions will cover every task that might be assigned, so employees are expected to remain flexible and to gladly serve as necessary.

### ***PERFORMANCE REVIEWS***

Ongoing and informal discussions around job performance between supervisors and employees is expected. In hopes of supporting this informal and relationally-driven process, Seven Mile Road has a formal annual review process that includes much briefer, quarterly reviews of performance, coming opportunities, and spiritual health.

### ***TERMINATION***

Upon termination of employment, employees must immediately return all church keys and church property.

### ***IT GUIDELINES***

Seven Mile Road will provided appropriate technology to employees. This technology is to be used for the advancement of Seven Mile Road's mission only.

Use of this technology for any immoral or illegal activity is strictly prohibited and may lead to discipline, up to and including termination.

## **REVISION AND REVIEW OF POLICY**

### ***ADMINISTRATIVE REVIEW***

Seven Mile Road's Human Resource Policies will be reviewed for accuracy helpfulness, and updates on an annual basis and modified as necessary.

### ***EMPLOYEE REVIEW***

All employees will review these policies on an annual basis and will be required to acknowledge this review by signing an *Acknowledgement of Receipt and Review* page.

***ACKNOWLEDGEMENT OF RECEIPT AND REVIEW***

I have received, reviewed, and understand Seven Mile Road's Human Resources Policies and Procedures. I also understand that I am expected to abide by all policies and procedures.

\_\_\_\_\_  
Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## **APPENDIX 1: CONFLICT OF INTEREST POLICY**

### ***Article I: Purpose***

The purpose of the Conflict of Interest Policy is to protect the interest of Seven Mile Road Church (hereafter the "Church") when the Church is contemplating entering into a transaction or arrangement that might benefit the private interest of an Elder/Director or Officer of the Church or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

### **Article II: Definitions**

Section 1. Interested Person. Any Elder, principal Officer, or Member of a committee with governing board delegated powers, who has a direct or indirect financial interest, as defined below, is an interested person.

Section 2. Financial Interest. A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which the Church has a transaction or arrangement
- b. A compensation arrangement with the Church or with any entity or individual with which the Church has a transaction or arrangement, or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Church is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

A financial interest is not necessarily a conflict of interest. Under Article III, Section 2, a person who has a financial interest may have a conflict of interest only if the appropriate governing board or committee decides that a conflict of interest exists.

### ***Article III: Procedures***

Section 1. Duty to Disclose. In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the Elders and members of committees with governing board delegated powers considering the proposed transaction or arrangement.

Section 2. Determining Whether a Conflict of Interest Exists. After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the governing board or committee meeting while the determination of conflict of interest is discussed and voted upon. The remaining board or committee members shall decide if a conflict of interest exists.

### Section 3. Procedures for Addressing the Conflict of Interest

- a. An interested person may make a presentation at the governing board or committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and vote on, the transaction or arrangement involving the possible conflict of interest.
- b. The chairperson of the governing board or committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.

- c. After exercising due diligence, the governing board or committee shall determine whether the Church can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- d. If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the governing board or committee shall determine by a majority vote of the disinterested directors whether the transaction or arrangement is in the best interest of the Church, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination it shall make its decision as to whether to enter into the transaction or arrangement.

Section 4. Violations of the Conflict of Interest Policy.

- a. If the governing board or committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- b. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the governing board or committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

***Article IV: Records of Proceedings***

The minutes of the governing board and all committees with board delegated powers shall contain:

- a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the governing board's or committee's decision as to whether a conflict of interest in fact existed.
- b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

#### ***Article V: Compensation***

- a. A voting member of the governing board who receives compensation, directly or indirectly, from the Church for services precluded from voting on matters pertaining to that member's compensation.
- b. A voting member of any committee whose jurisdiction includes compensation matters and who receives compensation, directly or indirectly, from the Church for services is precluded from voting on matters pertaining to that member's compensation.
- c. No voting member of the governing board or any committee whose jurisdiction includes compensation matters and who receives, directly or indirectly, from the Church, either individually or collectively, is prohibited from providing information to any committee regarding compensation.

### ***Article VI: Annual Statement***

Each Elder, principal Officer, and Member of a committee with governing board-delegated powers shall annually sign a statement which affirms such person:

- a. Has received a copy of the conflicts of interest policy,
- b. Has read and understands the policy,
- c. Has agreed to comply with the policy, and
- d. Understands the Church is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

### ***Article VII: Periodic Reviews***

To ensure the Church operates in a manner consistent with charitable purposes and does not engage in activities that could jeopardize its tax-exempt status, periodic reviews shall be conducted. The periodic reviews shall, at a minimum, include the following subjects:

- a. Whether compensation arrangements and benefits are reasonable, based on competent survey information and the result of arm's length bargaining.
- b. Whether the partnerships, joint ventures, and arrangements with management organizations conform to the Church's written policies, are properly recorded, reflect reasonable investment or payment for goods and services, further charitable purposes and do not result in inurement, impermissible private benefit or in an excess benefit transaction.

***Article VIII: Use of Outside Experts***

When conducting the periodic reviews as provided for in Article VII, the Church may, but need not, use outside advisors. If outside advisors are used, their use shall not relieve the governing board of its responsibility for ensuring periodic reviews

## **APPENDIX 2: SEXUAL HARASSMENT POLICY**

Until further notice, Seven Mile Road will use the *Model Sexual Harassment Policy MCAD Policy 96-2 Adopted by the Commission on October 25, 1996* provided by the Commonwealth of Massachusetts:

### ***I. Introduction***

It is the goal of Seven Mile Road to promote a workplace that is free of sexual harassment. Sexual harassment of employees occurring in the workplace or in other settings in which employees may find themselves in connection with their employment is unlawful and will not be tolerated by this organization. Further, any retaliation against an individual who has complained about sexual harassment or retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is similarly unlawful and will not be tolerated. To achieve our goal of providing a workplace free from sexual harassment, the conduct that is described in this policy will not be tolerated and we have provided a procedure by which inappropriate conduct will be dealt with, if encountered by employees.

Because Seven Mile Road takes allegations of sexual harassment seriously, we will respond promptly to complaints of sexual harassment and where it is determined that such inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of sexual harassment, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of sexual harassment.

## ***II. Definition Of Sexual Harassment***

In Massachusetts, the legal definition for sexual harassment is this: "sexual harassment" means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- a. submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or,
- b. such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a work place environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome sexual advances -- whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;

- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and,
- Discussion of one's sexual activities.

All employees should take special note that, as stated above, retaliation against an individual who has complained about sexual harassment, and retaliation against individuals for cooperating with an investigation of a sexual harassment complaint is unlawful and will not be tolerated by this organization.

### ***III. Complaints of Sexual Harassment***

If any of our employees believes that he or she has been subjected to sexual harassment, the employee has the right to file a complaint with our organization. This may be done in writing or orally.

If you would like to file a complaint you may do so by contacting Pastor Justin Gottlieb at 84 Green Street, Melrose, MA 02148 or by phone at 781.313.3421 ext. 702. Pastor Justin Gottlieb is also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

### ***IV. Sexual Harassment Investigation***

When we receive the complaint we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include a private interview with the person filing the complaint and with witnesses. We will also interview the person alleged to have committed sexual harassment. when we have completed our investigation, we will, to the extent appropriate inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

If it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is appropriate we will also impose disciplinary action.

### ***V. Disciplinary Action***

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may range from counseling to termination from employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

### ***VI. State and Federal Remedies***

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the government agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC - 300 days; MCAD - 300 days).

1. The United States Equal Employment Opportunity Commission ("EEOC")
2. The Massachusetts Commission Against Discrimination ("MCAD")