

**2023**

**Marin City Community  
Development Corporation  
Code of Professional  
Business Conduct and  
Ethics**



**Revised September 2021**

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## Introduction

### ***Marin City Community Development Corporation Purpose***

The Marin City Community Development Corporation (MCCDC) Code of Professional Business Conduct and Ethics (the “Code”) sets forth the guiding principles by which its team members conduct business with its clients, consumers, partners, vendors, and with each other. These principles apply to all MCCDC Board of Directors and Team Members. While it does not cover every issue that may arise, this Code outlines basic principles to guide all team members in regard to their professional business conduct and delivery of excellent services to our consumers and clients.

In addition to the principles set forth in this Code, team members are subject to the specific policies and procedures that have been adopted by MCCDC to govern certain business practices, behaviors and conduct, set forth in the MCCDC Employment Manual. The Board President, Executive Director, Chief Financial Officer and HR/ Office Manager are also covered by a Code of Ethics for Senior Financial Officers, which establishes additional duties and responsibilities beyond those set forth in this Code with which such financial officers must comply.

### ***Mission Statement***

The Marin City Community Development Corporation (MCCDC) was organized in 1979 to promote the economic well-being of members of the Marin City community. Recognizing the power of community support for its residents, we advocate for full employment and economic self-sufficiency through building skills and creating income generating programs. As a business oriented organization, we make available asset development programs to assist members in improving their present economic condition.

Marin City Community Development Corporation is committed to achieving superior financial and operating results while adhering to the highest standards of business conduct. The standards by which MCCDC operates provide the basis for our commitments to those with whom we interact: our consumers and clients, team members, business partners, and community. Our goal is to promote a professional culture of teamwork, excellence and integrity in a highly organized, welcoming setting.



## Our Consumers and Clients

### ***Providing Services to Our Consumers and Clients***

MCCDC’s success is largely dependent on building resilient, lasting relationships with its consumers, clients, and partners. MCCDC is committed to providing outstanding customer service, while promoting open, honest communication at all levels and providing quality wrap-around services to help our consumers and clients remove barriers to success and generational poverty.

*We build lasting relationships ...but never through unethical or illegal business practices.*

### ***Fair Dealing and Competition***

MCCDC seeks to excel in the completion of our work, meeting our measurable objectives fairly and honestly, seeking competitive advantages through superior performance, never through unethical or illegal business practices. Stealing proprietary information, developing partnerships without the Executive Director’s and the Board Members’ consent, or inducing disclosures by past or present team members of other companies, is prohibited. Each team member should endeavor to respect the rights of and deal fairly with the MCCDC’s consumers and clients, partners, suppliers, competitors and team members. No team member should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice.



## Our Organization

### **Compliance**

MCCDC proactively promotes compliance with internal policies and procedures, as well as applicable laws and regulations. MCCDC expects all team members to understand, respect, and comply with them as they apply to each team member in their position with MCCDC.

- + **Internal Policies and Procedures** – MCCDC policies and procedures are posted on its Intranet and may be available on a departmental basis. Strict adherence to all policies is required.
- + **Regulatory Compliance** – MCCDC respects and obeys the laws and regulations of every jurisdiction in which it operates. Although not all team members are expected to know the details of every law, it is important to know enough to determine when to seek advice from their immediate supervisors. Laws and regulations sometimes may be ambiguous and difficult to interpret. In such instances, directors and supervisors should contact the MCCDC Legal Representative for guidance.

*We promote and adhere to compliance with internal policies, procedures, laws and regulations.*

### **Conflicts of Interest**

MCCDC requires its team members to avoid conflicts of interest, or even the appearance of such, between their obligations to MCCDC and their personal affairs. A “conflict of interest” exists when a person’s private interests in any way interfere or appear to interfere or conflict with the legitimate interests of MCCDC.

- + **Corporate Opportunities** – Team members are prohibited from (1) personally taking, directly or indirectly, opportunities that properly belong to MCCDC or are discovered through the use of corporate property, information or position, (2) using corporate property, information, or position for improper personal gain, and (3) competing with MCCDC directly or indirectly. Team members have an obligation to advance MCCDC’s legitimate interests when the opportunity to do so arises. Team members must not have an interest, position, or relationship with any person, firm or corporation that may influence or result in a detriment to MCCDC.
- + **Gifts/Entertainment** – MCCDC encourages the use of good judgment and discretion, when giving or accepting gifts/entertainment in business settings. MCCDC does not solicit gifts, entertainment, or favors of any material value from persons or firms with which MCCDC actually or potentially does business. Nor

does MCCDC act in a manner that would place any vendor or consumer and client in a position to have to make a gift, provide entertainment, or provide personal favors to do business or continue to do business with MCCDC.

*No gift or entertainment should ever be offered, given, provided or accepted by any MCCDC team member, family member of a team member or agent unless it: 1) is not a cash gift; 2) is not excessive in value; 3) cannot be construed as a bribe or payoff; and 4) does not violate any laws or regulations. Please discuss with your director, supervisor or the HR/ OfficeManager any gifts or proposed gifts that could be perceived as inappropriate or excessive, including but not limited to the following factors which may impact or be impacted by the gift: vendor relationship, duration of the gift, nature of or perceived value of the gift, and/or conflicts of interest in relation to the team member's position.*

- ❖ **Family Relationships** – The employment of relatives through the level of first cousins (including relationships created by marriage) raises questions regarding confidentiality, objectivity, and integrity in work relationships. Therefore, MCCDC requires that each team member immediately disclose to his/her immediate manager any family relationships. Failure to disclose this information could result in disciplinary action, up to and including termination of employment. A team member related to a job applicant must not influence or participate in the hiring or placement process of that applicant. Related team members may not hold positions where either party would be directly or indirectly responsible for hiring, supervising, directing or controlling work assignments, performance evaluations, promotions or disciplinary actions, or compensation decisions. In addition, related individuals may not hold any position that would present any type of control concern, jeopardize the confidentiality of sensitive information or present any possible appearance of collusion or impropriety.



### **Protection of MCCDC Assets**

MCCDC team members are responsible for safeguarding its tangible and intellectual assets. Misappropriation of MCCDC’s assets is a breach of the board member’s or team member’s duty and may also constitute an act of fraud.

*We expect all team members to safeguard the physical and intellectual property of MCCDC.*

+ **Tangible Assets** – Board of Directors and Team Members must protect MCCDC’s physical assets and ensure their efficient use. Theft, carelessness, vandalism, and waste have a direct impact on the credibility and reputation of MCCDC. Any suspected incident of fraud, vandalism or theft should be immediately reported for investigation. MCCDC equipment must not be used for non-MCCDC business, though incidental personal use may be permitted if it is disclosed to and approved by the Executive Director. Unauthorized use could also be illegal and result in civil/criminal penalties and/or disciplinary action up to and including termination of employment.

+



+ **Intellectual Property** - The obligation of team members to protect MCCDC’s assets includes its intellectual property. Intellectual property includes trade secrets, patents, trademarks, and copyrights, as well as proprietary information such as business, marketing and service plans, program ideas and models, designs, grants, databases, records, salary information and any unpublished financial data and reports. Unauthorized use or distribution of this information would violate this Code, and could also be considered illegal and result in civil/criminal penalties and/or disciplinary action up to and including termination of employment.

***Financial Reporting***

+ **Internal Controls** - All of MCCDC’s books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect

MCCDC's transactions and must conform to applicable legal requirements and to MCCDC's system of internal controls. Records should always be retained or destroyed according to MCCDC's record retention policy or funding entity's policies. In the event of litigation or governmental investigation, please consult the MCCDC Legal Representative.

*We are committed to the full, accurate, and timely disclosure of financial information as required.*

- + **Federal and State Reporting** – As a public organization, it is of critical importance that MCCDC's filings of tax returns, payroll documents and audits be accurate and timely. Depending on their positions with MCCDC, MCCDC's financial consultants and team members may be called upon to provide necessary information to assure that MCCDC's public reports are complete, fair, and understandable. MCCDC expects team members in these positions to take this responsibility very seriously.

*We promote and implement prompt and consistent enforcement of this Code.*

### **Enforcement**

MCCDC expects team members to adhere to laws, regulations, and internal policies and procedures. MCCDC promotes and implements prompt and consistent enforcement of this Code, fair treatment for persons reporting questionable behavior, clear and objective standards for compliance, and a fair process by which to determine violation. Ethical behavior is enforced by the Board of Directors with the assistance of the Executive Director and the MCCDC Human Resources Representative, the MCCDC Legal Representative and the Executive Team.

- + **Disclosure Committee** – The primary responsibilities of this committee include the review of all complaints, investigation of reports of possible violations, and periodic reporting and evaluation of the effectiveness of MCCDC programs to the Executive Team.
- + **Human Resources Department** – The MCCDC Executive Director, MCCDC Human Resources Representative, and the MCCDC Legal Representative must regularly review, monitor and, as appropriate, update the Code and ensure that the current Code is published either on MCCDC's website or by other reasonable means.



Enforcement consequences may vary depending on the nature, severity, and willfulness of the violation. Enforcement consequences may include:

- 1) Warnings for inadvertent or non-intentional acts that do not materially harm MCCDC; and
- 2) Enforcement action in response to serious violations, including demotion, compensation reduction, or termination of employment; legal action to recover damages incurred by MCCDC; and/or reporting of illegal conduct to appropriate government agencies and funding sources.

*We are committed to conducting ourselves in  
an honest and ethical manner.*

### **Marketing**

The agency's marketing efforts are to accurately represent the services that are provided. It is the responsibility of the Program Director along with the Executive Director to produce marketing materials for clients and other stakeholders. Marketing materials are to be factual and are not to discuss services provided by competitors. Team members are to only use approved marketing materials. Media inquiries regarding services provided are referred to the Executive Director. In addition, all MCCDC team members should adhere to the following marketing and communications guidelines:

- Team members shall behave in a manner that demonstrates dignity and respect to persons served, staff members, peer supports, visitors, volunteers, and other stakeholders.
- Team members shall give preference to the mission of the organization over any personal, business, or marketing interest.
- Team members should not take unfair advantage of any professional relationship or exploit others to further their personal, religious, political, business interest, or sexuality.
- Team members shall adhere to MCCDC's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation.
- Team members shall not use MCCDC's business practices, marketing strategies, or service delivery protocols for personal or professional gains outside of their specific team member role within MCCDC.
- Team members shall use language that is respectful and professional when communicating with persons served, team members, volunteers, and other stakeholders.
- Team members shall not use any printed, audio, or visual aid materials belonging to MCCDC for their personal or professional gain or benefit. Any

misrepresentation of MCCDC’s mission, purpose, goals and objectives is prohibited.

- Team members may not represent or act as a spokesperson for MCCDC unless previously authorized by the Executive Director or Board of Directors.
- Team members shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders or persons served.

***Contractual Relationships***

The agency may contract with an individual or firm to perform specific tasks at an hourly rate or project cost. Individuals under contract are not considered employees of the agency, and proper credentials and proof of insurance or as required.

The agency may request verification of licensure, certification or accreditation, and/or insurance coverage. Contractual agreements must be approved and signed by the Executive Director. The relationship of a contractor to MCCDC is that of an independent contractor and no benefits, whether fringe benefits or other types of benefits, will be provided as a result of the contractual agreement. Team members of MCCDC who may work with an independent contractor are encouraged to report any suspected abuse, neglect, waste, or wrongdoing by the independent contractor to their supervisor, or to the HR/ Office Manager. Prior to the Contractor’s commencement of work, MCCDC must execute a contract with the third party. Proper credentials, proof of insurance, and skills appropriate to the contractual work is required. The contractors must also go through a thorough orientation that includes training in a variety of areas. Contractors must subscribe to Marin City Community Development Corporation’s Code of Ethics.

The Executive Director or designee, on behalf of the Board President, is the only staff member authorized to execute a contractual agreement. Once there is a legally binding agreement, MCCDC is required to adhere to the contract. All contracts will provide, at the minimum, the information listed below.

- a. Contracting Agency
- b. Contract Identification Number
- c. Name of Contract
- d. Scope of Services
- e. Time of Performance
- f. Payment Schedule
- g. General and Special Conditions, if applicable
- h. Notification Requirements
- i. Dual indemnity or hold harmless clauses.

***Service Delivery Standards***

Professional codes of conduct should also be implemented by all team members in the MCCDC service delivery process as follows:

- Team members shall ensure that the organization’s person-centered planning philosophy and the “people first” concept is evident in the service delivery process
  - Team members must ensure that all barriers to accessibility are assessed, addressed, and removed to the fullest extent possible.
  - Team members must have knowledge of the legal status of persons served.
  - Team members shall, when applicable, provide information to persons served regarding resources related to legal status and help link persons served to these resources.
  - Team members shall be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.
- 
- Team members should inform persons served when a real, or potential, conflict of interest arises, and take reasonable steps to resolve the issue in a manner that makes the persons’ served interest primary and protects the persons’ served interest to the greatest extent possible.
  - Team members are prohibited from accepting money, exchanging gifts, gratuities, or other consideration from anyone other than MCCDC for the performance of any act which he/she would be required or expected to render in the regular course of his/her duties as a MCCDC employee.
  - Team members shall not engage in fundraising activities that are not sanctioned and approved by the Executive Director as permissible fundraising activities. Examples of fundraising activities that would not be under the domain of the organization may include: the selling of cookies, candy, tickets, or other items that are personal initiatives of an employee and/or his or her family member.
  - Team members, as may be appropriate in their role, shall respect and safeguard the personal property of persons served, visitors, and all property of the organization.
  - Team members are prohibited from providing services to individuals, client’s family or friends with whom they have a personal, including dating, intimate, prior or current intimate relationship.
  - Team members shall not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the Executive Director.
  - Team members shall recognize and respect the inherent dignity and worth of the person and persons within the persons served care system.
  - Team members’ primary goals are to help people in need find employment or prepare for entry or upward mobility in the workforce, address social problems, and support the wellbeing of persons served.
  - Team members shall challenge social injustice where appropriate and report any instances of social injustice to the Executive Director.

- Team members shall recognize the cultural, racial and ethnic importance of human relationships.
- Team members shall behave in a trustworthy manner with those whom they serve.
- Team members shall use language that is respectful and professional when communicating with persons served, team members, volunteers, and other stakeholders.
- Team members shall practice within their areas of competencies and develop and enhance their professional expertise.
- Team members shall maintain and update their professional licenses, credentials, certifications and clinical privileges.
  
- Team members shall respect and promote the rights of persons served to self-determination, and assist persons served in their efforts to identify and clarify their employment goals.
- Team members shall write legibly and use clear, specific and understandable language in the Individual Service Plan documentation of persons' served case activities.
- Team members shall use clear and understandable language to inform persons served of the purpose of services, and risks related to services.
- Team members shall use clear and understandable language to inform persons of limits to services, because of the requirements of a third party payer.
- Team members shall provide persons served with reasonable access to their records.
- Team members shall not use derogatory language in their written or verbal communication to, or about, persons served.
- Team members should make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.
- Team members are prohibited from having clients sign blank forms.
- Team members shall not discuss client's case information without provisions for relative confidentiality.
- Team members shall not leave persons' served case record information on desks, or in any other unsecured manner, thus violating persons' served confidentiality.
- Team members shall not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.

## Our Team Members

### ***General Ethics***

All MCCDC team members must conduct themselves in an honest and ethical manner. Team members are expected to observe all laws applicable to our business, including but not limited to federal, state/provincial and local laws.

MCCDC expects compliance with its internal policies and procedures, as well as applicable laws and regulations, and will not tolerate team members who achieve results at the cost of violating laws and/or compliance.

While this Code addresses many ethical issues, it cannot address every issue that team members may encounter. As such, if a situation arises in which a team member is unsure if an action would be deemed unethical, the team member should consult his/her immediate director.

If the team member is not comfortable addressing the issue with his/her immediate director, the team member should contact the MCCDC Executive Director.

*We are committed to safeguarding important MCCDC information.*

### ***Protecting Confidentiality***

MCCDC is committed to safeguarding information from unauthorized access, disclosure, modification or destruction. Confidential information includes all non-public information that is considered private, proprietary, or sensitive in nature, including but not limited to:

- 1) Department of Rehabilitation (DOR), Workforce Intermediary Services (WIS), Skill Builder, contractors, partners, stakeholders, and client information;
- 2) Team Member records;
- 3) Financial and Loan Information;
- 4) Strategic Plans; and
- 5) External and Internal Controls.

The ethical obligation to preserve confidential information continues even after employment ends.

*We are committed to personal and corporate professionalism.*

## ***Personal Conduct***

All team members are expected to execute their duties with a high standard of professional and personal ethics. Each individual must deal with other team members, clients, consumers and other stakeholders with integrity and honesty. Team members must not assist others who are attempting to violate any law, regulation, or policy, or attempting to commit an unethical act. Team members are responsible for upholding and promoting integrity in the MCCDC high performance culture. Team members must exhibit accountability for their work, respect for the ***Chain-of-Command***, and support for the positive growth and continued development of MCCDC.

- + **Falsifying Information** – Team members must not falsify information, whether verbal or written, in an application for employment or during the course of performing their job duties. This includes but is not limited to omitting or falsifying information on an employment application, timecard, timesheet, personnel or other organization documents or records, such as documents evidencing service to consumers and program participants, case management documents, credit applications, and/or organization agreements and evaluation metrics. Mistakes should never be covered up, but should be immediately disclosed in full, and corrected as soon as possible. Falsification of any MCCDC client, consumer, or third party document is strictly prohibited and/or grounds for termination of employment.

*We must never rationalize or even consider misrepresenting facts or falsifying records.*

- + **Improper Use of MCCDC's Time/Resources** – The use of the MCCDC resources and services for non-official purposes is permitted only in compliance with the following criteria:
  - 1) The cost to the MCCDC must be negligible.
  - 2) The use must not interfere with a MCCDC team member's obligation to carry out MCCDC's duties in a timely and effective manner. Time spent engaged in the non-official use of MCCDC's resources is not considered to be MCCDC's work time.
  - 3) The use must in no way undermine the use of MCCDC's resources and services for official purposes.
  - 4) The use neither expresses nor implies sponsorship or endorsement by the MCCDC.

- 5) The use must be consistent with state and federal laws regarding obscenity, libel, or the like, and state and federal laws and MCCDC's policies regarding political activity, the marketing of products or services, or other inappropriate activities.
- 6) Users should be aware that internal or external audit or other needs may require examination of uses of MCCDC's resources or services and should not expect such uses to be free from inspection.

**Application:** Each occurrence will depend upon the particular circumstances and other important factors such as materiality or reasonableness. The ultimate control, therefore, lies with each team member's supervisor, as that team member should have direct knowledge of the behaviors and needs of the individual team member.

**Appropriateness of Practices:** Team members should consult with their supervisors in advance if they have any questions about appropriateness of certain practices. A supervisor's decision cannot, however, circumvent other policies and procedures of the MCCDC that may restrict personal use beyond the limitations cited herein. For example, the use of MCCDC telephones, fax machines, mail services, and vehicles must comply with existing MCCDC policies, and the use of MCCDC resources in political activity is prohibited.

*We must exercise good judgement in using MCCDC time and resources for non-business purposes.*

**Cell Phones, Telephones and Fax Machines:** Governs the use of cell phones, telephones and fax machines that were provided to a team member by MCCDC, and indicates more specifically that these phones and machines are for business use only. Any such MCCDC-Owned Cell Phones are to be protected by the team member, and returned when his or her employment ends. Personal calls may not be billed to MCCDC telephone and cell phone numbers. Personal long distance calls may be made from MCCDC telephones only when these calls are placed as credit card, collect, third number (non-MCCDC) calls unless the cell phone carrier provides unlimited calling and text. If the MCCDC cell phone has a data or texting limit overages, the MCCDC team member incurring the charges must reimburse MCCDC immediately for those charges. This telephone policy also applies to the use of MCCDC phones, cell phones and fax machines. Team members that abuse the MCCDC's cell phones, telephones and fax services will, at a minimum, be billed for all personal calls not MCCDC-related business and

such team member will be subjected to disciplinary action and/or termination of employment.

**Mail Services:** MCCDC's Mail Services states, "The organization mail system will be used solely for the distribution of U.S. mail delivered to the Organization Mail Center and for intra-MCCDC mail, including publications produced by the MCCDC or its related units but excluding team member publications." The MCCDC mail system will not be used for the distribution of non-MCCDC related publications that are designed primarily for free circulation, nor for printed publications containing only advertising or designed primarily for advertising purposes. Use of the organization mail system for real estate advertising, chain letters, or private use for personal advantage is specifically prohibited.

Individuals or departments that abuse the organization mail service will, at a minimum, be billed regular first class postage for all copies distributed and such team member will be subjected to disciplinary action for misconduct and abuse of organization's office equipment and mail services usage, up to and including termination of employment.

**Vehicles:** A supervisor also cannot allow the use of a MCCDC Vehicle that is not in compliance with our Vehicle Policy.

**Political Activity:** Political activity by MCCDC team members is regulated by Federal and State law and MCCDC policy. No team member may use MCCDC funds, vehicles, equipment, supplies, or other resources in connection with partisan political activities. This includes the use of any/all MCCDC's electronic resources, telephones, and computer equipment.

*Harassment in any form will not be tolerated.*

- ❖ **Harassment** – MCCDC believes that every team member is entitled to a workplace free from unlawful harassment. Additionally, clients and consumers are entitled to professional, courteous communication from all team members. Prohibited conduct includes unwelcome sexual advances, comments and actions based on national origin, gender, age, disability, religion or race, or other personal grounds prohibited by law. Use of profanity in the workplace is unwelcomed.



**+ Maintaining a Safe and Healthy Workplace** – MCCDC provides a safe work environment for its team members.

- 1) Possession of weapons or other dangerous devices by any team member, excluding authorized security personnel, at any time on MCCDC or client and consumer premises, is strictly prohibited. Any team member who reports to work with such a weapon, or who is found to be in possession of such a weapon while at work or on MCCDC business, will be subject to appropriate disciplinary action.
- 2) Fighting, throwing objects, horseplay, practical jokes, or other disorderly or rude conduct that may endanger the well-being of any team member or MCCDC operations is prohibited.
- 3) Engaging in acts of dishonesty, fraud, theft, or sabotage will not be tolerated and are grounds for immediate termination of employment.
  
- 4) Threatening, intimidating, coercing or interfering with the performance of other team members is prohibited.
- 5) Smoking is prohibited on MCCDC premises. MCCDC promotes a smoke-free environment.

**+ Substance Abuse** – MCCDC is committed to maintaining a drug-free and smoke-free workplace. Being under the influence of, unlawfully using, possessing, selling, and/or consuming non-prescription drugs, controlled substances and/or alcohol on Organization premises, is strictly prohibited and grounds for termination of employment. Team members who suspect they have an alcohol or drug dependency issue are encouraged to contact their director or supervisor and to follow appropriate treatment referrals promptly before it results in job performance problems and/or are grounds for immediate termination of employment.

**+ Conflict with Team Members and/or Directors** – Insubordination and/or any display of gross disrespect for a director, manager and/or a fellow team member will not be tolerated. Refusal to comply with instructions or failure to perform reasonable duties that are assigned may result in disciplinary action up to and including termination of employment. Each team member is expected to act in a mature, professional manner at all times when in the workplace. Grievances should be discussed in an appropriate manner in the appropriate setting. Team members are encouraged to address and resolve grievances directly with the other party. However, if the team member is uncomfortable with this approach, he/she should discuss these concerns with his/her director or contact the MCCDC Human Resources Department.

**Reporting**

Every team member at MCCDC has an obligation to report unethical/illegal behaviors or violations of laws, regulations or policies.

*Every team member has an obligation to report unethical or illegal behavior and violation of internal policies, procedures, laws, and regulations.*

**+ Illegal or Unethical**

**Behavior** – MCCDC proactively promotes ethical behavior and encourages team members to communicate to directors, team leaders, and higher levels of departmental management of any observed unethical behavior. If the individuals to whom such information is conveyed are unresponsive, or if there is reason to believe that reporting to such individuals is inappropriate in particular cases, then the team member

should contact the Executive Director. Such communications will be kept confidential to the fullest extent possible. MCCDC prohibits retaliation for reports made in good faith.

- + Complaints regarding Accounting, Internal Controls, and Auditing Matters** – Team members who identify any person(s) engaged in fraudulent activity or misconduct related to accounting, internal controls, and/or auditing matters are required to report their suspicions to any of the following: immediate director or higher level of departmental management; Chief Financial Officer; Executive Director; or the Board President.

## Accountability

**Team Member Accountability**

Each team member is responsible for adhering to the standards of conduct outlined in this Code as well as all applicable laws, regulations, policies and procedures. Each team member is expected to raise questions of concern when operational and performance standards are not being met. Team members are also expected to have excellent attendance and produce high quality work. Evidence of sustained low or inadequate work performance or work product is grounds for disciplinary action up to and including termination of employment. Violations of the Code may result in disciplinary action up to and including termination of employment.

- + **Public Trust** – The MCCDC deals constantly with the public's perception of how we conduct the business of the MCCDC. All MCCDC team members must be constantly mindful of the public trust that we discharge, of the necessity for conducting ourselves with the highest ethical principles, and avoiding any action that may be viewed as a violation of the public trust. As custodians of resources entrusted us by the public, government entities, and private donors, we should always be mindful of how we utilize these resources. As members of an organization community, we should also be mindful of our responsibility to act so that others are not deprived of access to these same resources as they perform their duties. These resources include, but are not limited to, team member's time, facilities, supplies, and equipment, such as cell phones, telephones, fax machines, computers, other office machinery, and MCCDC vehicles.
- + **Accountability** – In any business/organization environment, however, accountability must be balanced with a consideration of the needs of team members to carry on normal day-to-day responsibilities related to their personal lives. The complex task of balancing accountability to the MCCDC with the life-needs of team members calls for the MCCDC to provide direction for managers when weighing these two essential obligations.

## Our Community

### *Working with Our Community*

MCCDC has a strong and demonstrated commitment to the improvement of the communities in which we work and operate. MCCDC encourages its team members to support charitable, civic, educational, and cultural causes. Team members are encouraged to make contributions of personal time or financial resources to nonprofit organizations according to their own interests, availabilities and priorities. However, extensive time off for such activities that interferes with completion of MCCDC work must first receive written permission from the Executive Director.

Team members active in a community-based nonprofit organization should be alert to possible conflicts of interest between MCCDC and the community-based organization.

## Amendments, Modifications, and Waivers

This Code may be amended or modified by the MCCDC Board of Directors, Executive Team or Legal Representative at any time as needed. Any waiver of this

Code may only be made by the MCCDC Board of Directors, Executive Team or Legal Representative and will be promptly disclosed as required by law.



## Resources and References

### ***Reporting Policy Violations***

If team members become aware of activities that are inconsistent with the standards outlined in this Code, immediately contact a MCCDC Director. You can also contact MCCDC's HR/ Office Manager, Executive Director, or Board President as they are sensitive to the need for confidentiality. However, information that involves a threat to life or property, illegal activities, or legal action against MCCDC may require a full investigation that does not allow for complete anonymity. Information will be kept confidential to the extent possible.

The following are additional resources to use when appropriate:

### **Compliance Department: (415) 339-2837**

Contact for complaints regarding:

- 1) Code of Professional Business Conduct and Ethics;
- 2) Accounting;
- 3) Internal Controls; and

4) Auditing Matters.

**Marin City Sherriff's Department: (415) 332-5422 or 911**

Contact for incidents and/or situations regarding:

- 1) Physical or Verbal Safety Concerns;
- 2) Thefts or Burglaries;
- 3) Threats of Workplace Violence; and
- 4) Bomb Threats.

**Human Resources Department: (877) 762-**

**4346** Contact for complaints regarding:

- 1) Equal Employment Opportunity;
- 2) Harassment; and
- 3) Grievances.

**CODE OF PROFESSIONAL BUSINESS CONDUCT AND  
ETHICS ACKNOWLEDGEMENT FORM**

(For Program Use-This Acknowledgement was added to Policy & Procedures Agreement and Acknowledgement Form-Refer to this for acceptance. Employment Use will sign this form for records.)

On this date \_\_\_\_\_, I, \_\_\_\_\_, certify that I have received and read a copy of the Code of Professional Business Conduct and Ethics Policy.

Also, I understand my responsibilities with respect to the Principles and Standards as outlined. I further agree to comply with the Principles and Standards set forth by the Marin City Community Development Corporation in the Code of Professional Business Conduct and Ethics Policy.

Note: In order to be in compliance with the Marin City Community Development Corporation in the Code of Professional Business Conduct and Ethics Policy, all employees are required to read the Code of Professional Business Conduct and Ethics Policy and complete an Acknowledgement form annually.

\_\_\_\_\_

Print Name \_\_\_\_\_

Team Member's Title

Team Member Signature





## Marin City Community Development Corporation CONFIDENTIALITY POLICY AND AGREEMENT

This Confidentiality Agreement (this "**Agreement**") is made effective as of **Month Date, 20)0**( between **Marin City Community Development Corporation (MCCDC)**, located on 441 Drake Avenue, Marin City, California 94965, and **Name of Employee, Title or Position**. In this Agreement, the party who owns the Confidential Information will be referred to as "**MCCDC**", and the party to whom the Confidential Information will be disclosed will be referred to as "**EMPLOYEE**".

MCCDC is a nonprofit 501(c)(3) community economic development corporation. **EMPLOYEE** is a **Title or Position** with the corporation. MCCDC has requested that **EMPLOYEE** protect confidential material and information which may be disclosed between MCCDC and **EMPLOYEE**. Therefore, the parties agree as follows:

### **L CONFIDENTIAL INFORMATION.**

The term "Confidential Information" means any information or material which is proprietary to MCCDC, whether or not owned or developed by MCCDC, which is not generally known other than by MCCDC, and which **EMPLOYEE** may obtain through any direct or indirect contact with MCCDC.

#### A. Confidential Information includes without limitation:

- business records and plans;
- financial information;
- customer lists, records, and other information;
- trade secrets;
- technical information;
- products;
- product design information;
- pricing structure;
- costs;
- computer programs and listings;
- source code and/or object code;
- personnel actions and staff related issues and information; and
- other proprietary information.

#### B. Confidential Information does not include:

- matters of public knowledge that result from disclosure by MCCDC;
- information rightfully received by a third party without a duty of confidentiality;
- information disclosed by operation of law;
- information disclosed with the prior written consent of MCCDC; and





## Marin City Community Development Corporation

### CONFIDENTIALITY POLICY AND AGREEMENT

- any other information that both parties agree in writing is not confidential.

## II. PROTECTION OF CONFIDENTIAL INFORMATION.

EMPLOYEE understands and acknowledges that Confidential Information has been developed or obtained by MCCDC by the investment of significant time, effort and expense, and that Confidential Information is a valuable, special and unique asset of MCCDC which provides MCCDC with a significant competitive advantage, and needs to be protected from improper disclosure. In consideration for the disclosure of the Confidential Information, EMPLOYEE agrees to hold in confidence and to not disclose the Confidential Information to any person or entity without the prior written consent of MCCDC. In addition, agrees that:

*A. No Copying/Modifying.*

EMPLOYEE will not copy or modify any Confidential Information without the prior written consent of MCCDC.

*B. Application to EMPLOYEES.*

Further, EMPLOYEE shall not disclose any Confidential Information to any EMPLOYEES of MCCDC, except those EMPLOYEES who are required to have the Confidential Information in order to perform their job duties in connection with the limited purposes of this Agreement. Each permitted EMPLOYEE to whom Confidential Information is disclosed shall sign a non-disclosure agreement substantially the same as this Agreement at the request of MCCDC.

*C. Unauthorized Disclosure of Information.*

If it appears that EMPLOYEE has disclosed (or has threatened to disclose) Confidential Information in violation of this Agreement, MCCDC shall be entitled to an injunction to restrain EMPLOYEE from disclosing, in whole or in part, the Confidential Information. MCCDC shall not be prohibited by this provision from pursuing other remedies, including a claim for losses and damages.

## III. RETURN OF CONFIDENTIAL INFORMATION.

Upon the written request of MCCDC, EMPLOYEE shall return to MCCDC all written materials containing the Confidential Information. EMPLOYEE shall also deliver to MCCDC written statements signed by EMPLOYEE certifying that all materials have been returned within five (5) days of receipt of the request.



## **Marin City Community Development Corporation**

### **CONFIDENTIALITY POLICY AND AGREEMENT**

#### **IV. NO WARRANTY.**

EMPLOYEE acknowledges and agrees that the Confidential Information is provided on an AS IS basis. MCCDC MAKES NO WARRANTIES, EXPRESS OR IMPLIED, WITH RESPECT TO THE CONFIDENTIAL INFORMATION AND HEREBY EXPRESSLY DISCLAIMS ANY AND ALL IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE. IN NO EVENT SHALL MCCDC BE LIABLE FOR ANY DIRECT, INDIRECT, SPECIAL, OR CONSEQUENTIAL DAMAGES IN CONNECTION WITH OR ARISING OUT OF THE PERFORMANCE OR USE OF ANY PORTION OF THE CONFIDENTIAL INFORMATION.

MCCDC does not represent or warrant that any product or business plans disclosed to EMPLOYEE will be marketed or carried out as disclosed, or at all. Any actions taken by EMPLOYEE in response to the disclosure of the Confidential Information shall be solely at the risk of EMPLOYEE.

#### **V. LIMITED LICENSE TO USE.**

EMPLOYEE shall not acquire any intellectual property rights under this Agreement except the limited right to use set out above. EMPLOYEE acknowledges that, as between MCCDC and EMPLOYEE, the Confidential Information and all related copyrights and other intellectual property rights, are (and at all times will be) the property of MCCDC, even if suggestions, comments, and/or ideas made by EMPLOYEE are incorporated into the Confidential Information or related materials during the period of this Agreement.

#### **VI. GENERAL PROVISIONS.**

This Agreement sets forth the entire understanding of the parties regarding confidentiality. The obligations of confidentiality shall survive indefinitely from the date of disclosure of the Proprietary Information. Any amendments must be in writing and signed by both parties. This Agreement shall be construed under the laws of the State of California. This Agreement shall not be assignable by either party, and neither party may delegate its duties under this Agreement, without the prior written consent of the other party. The confidentiality provisions of this Agreement shall remain in full force and effect after the effective date of this Agreement.



## Marin City Community Development Corporation

### CONFLICT OF INTEREST POLICY

It is in the best interest of Marin City Community Development Corporation (MCCDC) to be aware of and properly manage all conflicts of interest and appearances of a conflict of interest. This conflict of interest policy is designed to help directors, officers, team members and volunteers of the MCCDC identify situations that present potential conflicts of interest and to provide MCCDC with a procedure to appropriately manage conflicts in accordance with legal requirements and the goals of accountability and transparency in MCCDC's operations.

**1. Conflict of Interest Defined.** In this policy, a person with a conflict of interest is referred to as an "***interested person***." For purposes of this policy, the following circumstances shall be deemed to create a Conflict of Interest:

- a. A director, officer, team member or volunteer, including a board member (or family member of any of the foregoing) is a party to a contract, or involved in a transaction with MCCDC for goods or services.
- b. A director, officer, team member or volunteer, including a board member (or a family member of any of the foregoing) has a material financial interest in a transaction between MCCDC and an entity in which the director, officer, team member or volunteer, or a family member of the foregoing, is a director, officer, agent, partner, associate, team member, trustee, personal representative, receiver, guardian, custodian, or other legal representative.
- c. A director, officer, team member or volunteer, including a board member (or a family member of the foregoing) is engaged in some capacity or has a material financial interest in a business or enterprise that competes with MCCDC.

Other situations may create the ***appearance of a conflict***, or present a ***duality of interests*** in connection with a person who has influence over the activities or finances of the organization. All such circumstances should be disclosed to the board or team member, as appropriate, and a decision made as to what course of action the organization or individuals should take so that the best interests of the organization are not compromised by the personal interests of stakeholders in the organization.

**Gifts, Gratuities and Entertainment.** Accepting gifts, entertainment or other favors from individuals or entities can also result in a conflict or duality of interest when the party providing the gift/entertainment/favor does so under circumstances where it might be inferred that such action was intended to influence or possibly would influence the interested person in the performance of his or her duties. This does not preclude the acceptance of items of nominal or insignificant value or entertainment of nominal or insignificant value which are not related to any particular transaction or activity of MCCDC.



## Marin City Community Development Corporation

### CONFLICT OF INTEREST POLICY

#### 2. Definitions.

- a. A "Conflict of Interest" is any circumstance described in Part 1 of this Policy.
- b. An "Interested Person" is any person serving as an officer, team member or member of the Board of Directors of MCCDC or a major donor to MCCDC or anyone else who is in a position of control over MCCDC who has a personal interest that is in conflict with the interests of MCCDC.
- c. A "Family Member" is a spouse, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister, of an interested person.
- d. A "Material Financial Interest" in an entity is a financial interest of any kind, which, in view of all the circumstances, is substantial enough that it would, or reasonably could, affect an Interested Person's or Family Member's judgment with respect to transactions to which the entity is a party.
- e. A "Contract or Transaction" is any agreement or relationship involving the sale or purchase of goods or services, the providing or receipt of a loan or grant, the establishment of any other type of financial relationship, or the exercise of control over another organization. The making of a gift to MCCDC is not a Contract or Transaction.

#### 3. Procedures.

- a. Prior to board or committee action on a Contract or Transaction involving a Conflict of Interest, a director or committee member having a Conflict of Interest and who attends the meeting shall disclose all facts material to the Conflict of Interest. Such disclosure shall be reflected in the minutes of the meeting. If board members are aware that team members or other volunteers have a conflict of interest, relevant facts should be disclosed by the board member or by the interested person him/herself if invited to the board meeting as a guest for purposes of disclosure.
- b. A director or committee member who plans not to attend a meeting at which he or she has reason to believe that the board or committee will act on a matter in which the person has a Conflict of Interest shall disclose to the chair of the meeting all facts material to the Conflict of Interest. The chair shall report the disclosure at the meeting and the disclosure shall be reflected in the minutes of the meeting.
- c. A person who has a Conflict of Interest shall not participate in or be permitted to hear the board's or committee's discussion of the matter except to disclose material facts and to respond to questions. Such person shall not attempt to exert his or her personal influence with respect to the matter, either at or outside the meeting.



## Marin City Community Development Corporation

### CONFLICT OF INTEREST POLICY

- d. A person who has a Conflict of Interest with respect to a Contract or Transaction that will be voted on at a meeting shall not be counted in determining the presence of a quorum for purposes of the vote.
- e. The person having a conflict of interest may not vote on the Contract or Transaction and shall not be present in the meeting room when the vote is taken, unless the vote is by secret ballot. Such person's ineligibility to vote shall be

reflected in the minutes of the meeting. For purposes of this paragraph, a member of the Board of Directors of MCCDC has a Conflict of Interest when he or she stands for election as an officer or for re-election as a member of the Board of Directors.

- f. Interested Persons who are not members of the Board of Directors of MCCDC, or who have a Conflict of Interest with respect to a Contract or Transaction that is not the subject of Board or committee action, shall disclose to their supervisor, or the Chair, or the Chair's designee, any Conflict of Interest that such Interested Person has with respect to a Contract or Transaction. Such disclosure shall be made as soon as the Conflict of Interest is known to the Interested Person. The Interested Person shall refrain from any action that may affect MCCDC's participation in such Contract or Transaction.

In the event it is not entirely clear that a Conflict of Interest exists, the individual with the potential conflict shall disclose the circumstances to his or her supervisor or the Chair or the Chair's designee, who shall determine whether full board discussion is warranted or whether there exists a Conflict of Interest that is subject to this policy.

#### **4. Confidentiality.**

Each director, officer, team member and volunteer shall exercise care not to disclose confidential information acquired in connection with disclosures of conflicts of interest or potential conflicts, which might be averse to the interests of MCCDC. Furthermore, directors, officers, team members and volunteers shall not disclose or use information relating to the business of MCCDC for their personal profit or advantage or the personal profit or advantage of their Family Member(s).

#### **5. Review of policy.**

- a. Each director, officer, team member and volunteer shall be provided with and asked to review a copy of this Policy and to acknowledge in writing that he or she has done so.

Annually each director, officer, team member and volunteer shall complete a disclosure form identifying any relationships, positions or circumstances in which s/he is involved that he or she believes could contribute to a Conflict of Interest. Such relationships, positions or circumstances might include service as a director of or consultant to another organization, or ownership of a business that might provide goods or services to MCCDC. Any such information regarding the



## Marin City Community Development Corporation

### CONFLICT OF INTEREST POLICY

business interests of a director, officer, team member or volunteer, or a Family Member thereof, shall be treated as confidential and shall generally be made available only to the Chair, the Executive Director, and any committee appointed

reflected in the minutes of the meeting. For purposes of this paragraph, a member of the Board of Directors of MCCDC has a Conflict of Interest when he or she stands for election as an officer or for re-election as a member of the Board of Directors.

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## Marin City Community Development Corporation

### CONFLICT OF INTEREST POLICY

- c. to address Conflicts of Interest, except to the extent additional disclosure is necessary in connection with the implementation of this Policy.
- d. This policy shall be reviewed annually by each member of the Board of Directors. Any changes to the policy shall be communicated to all team members and volunteers.



**Marin City Community Development Corporation  
CONFLICT OF INTEREST POLICY**

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**Marin City Community Development Corporation  
CONFLICT OF INTEREST POLICY**

**CONFLICT OF INTEREST DISCLOSURE FORM**

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_  
(team member/volunteer/trustee/Board member)

Please describe below any relationships, transactions, positions you hold (volunteer or otherwise), or circumstances that you believe could contribute to a conflict of interest between MCCDC and your personal interests, financial or otherwise:

\_\_\_\_\_ I have no conflict of interest to report.

\_\_\_\_\_ I have conflict of interest to report.

Signature: \_\_\_\_\_



## Marin City Community Development Corporation

### CULTURAL COMPETENCE POLICY AND PROCEDURES

#### I. Overview

The Marin City Community Development Corporation (MCCDC) encourages team members to demonstrate their ability to serve individuals from diverse cultures. The organization and its personnel are always accountable for culturally appropriate services.

Unlike a traditional policy that sets forth strict guidelines and rules, this policy encourages team members to seek development opportunities for themselves as individuals as well as bringing back learning opportunities for the agency to consider using as a whole. Cultural competence is a continuous process; it is not something that one person or agency simply attains.

MCCDC is committed to meeting the needs of our clients in all their diversity. This includes a broad range of human differences such as age, educational level, ethnicity, gender, geographic origin, race, religion, sexual orientation, socioeconomic class, and values. We encourage all MCCDC team members to enhance their abilities to provide culturally competent services. This may mean through group instruction, or through team members seeking individualized training on specific populations or subgroup needs.

MCCDC recognizes that disparities often exist in outcomes experienced by minorities and those experienced by the general population and is committed to overcoming those disparities. MCCDC believes that we can enhance our cultural competence with:

- *Personnel* – providers, paraprofessionals, and administrators with appropriate skills, knowledge, and attitudes;
- *Services* – interventions and treatments proven effective with individuals from the diverse communities likely to be served;
- *Administrative Procedures* – management practices designed to ensure access to culturally appropriate services and competent personnel; and
- *Regular Training* – team members need to constantly improve their skills and increase their knowledge. This may take the form of agency-led training or individual team members seeking out their own skill advancement opportunities.

#### II. Cultural Competence Definition

Cultural competence is a journey; not a destination that one can ever fully attain. Cultural competence means the ability and the will to respond to the unique needs of



## Marin City Community Development Corporation

### CULTURAL COMPETENCE POLICY AND PROCEDURES

an individual participant or family that arise from the customer's culture and the ability to use the person's cultural strengths as a resource or tool. For example, these strengths can be used in the Individual Service Plan (ISP) development process. For the organization, cultural competence means the ability to provide equal and meaningful access and equal quality to individuals from each cultural and linguistic population served, based on an understanding of each population's distinct needs. For the professional, the ability to use the client's culture as a resource will depend, in part, upon knowledge of specific cultures and their histories, skills in cross-cultural and culturally-specific practices, and the ability to communicate effectively.

Cultural competence indicates the ability to work across cultures; to appropriately serve clients of cultures different from one's own. Since individuals and organizations are not, by nature, culturally competent, they take active steps to change behavior. MCCDC team members should:

- Learn what the client's culture believes about family, health, and mental health, cultural values, and patterns of family dysfunction, disease incidence and prevalence.
- Develop skills to provide appropriate service for diverse populations.
- Effectively exchange information and understand preferences about the client's presenting problem or condition and related history.

In this document, "culturally competent" indicates the ability to work across multiple cultures and is, therefore, distinct from "culturally specific" which refers to capability with one particular culture.

Being of a cultural minority does not, itself, make a person culturally competent. For example, an African American psychologist may be competent to provide culturally-specific services to African American clients but would not be culturally competent unless she has demonstrated success in treating clients of at least one other culture.

Becoming more culturally competent requires not only learning more about others' cultures, but also about one's own culture, as a point of reference in trying to understand the more subtle effects of culture on behaviors and beliefs.

No individual can be deeply familiar with all of the cultural beliefs that affect health and behavior in the Bay Area's heterogeneous society. It may be that an individual cannot become an expert in even one non-native culture. For this reason, these Guidelines eschew the notion of being culturally competent in favor of the notion of pursuing cultural competence. To develop increased cultural competence, every provider can acknowledge a culture's profound effect on health and social outcomes and can be willing to learn more about this powerful interaction.



## Marin City Community Development Corporation

### CULTURAL COMPETENCE POLICY AND PROCEDURES

Cultural competence does not mean treating all members of a cultural group in the same manner. Too much emphasis on gaining pedantic knowledge of a particular nonnative culture could encourage stereotyping because it may distract even a well-meaning learner from the client's individualized response to his or her culture. Cultural competence is a subset of individualized care in the sense that it is the ability to provide individualized care that accounts for the influences and benefits of the client's culture. Thus, an organization that gains the skills in cultural competence, consequently increases its ability to serve all diversity, including those who are racial and ethnic minorities.

#### **III. Cultural Competence and Service Delivery**

The reason to become more culturally competent is to provide better services; MCCDC cannot be programmatically effective unless it is culturally competent.

One cannot completely achieve cultural competence but one must instead strive toward greater cultural competence. These procedures are designed to help team members move toward that goal.

A professional strives for cultural competence to become a better workforce or social services provider, to make services equally accessible to all of the diverse groups that the organization serves. For team members to accurately determine an individual's needs and to appropriately work with the customer to develop a plan on how to address those needs and their goals, the professional first needs to understand how the participants' culture affects them. This may inform what cultural strengths might influence those needs. While all people share common basic needs, there are vast differences in how people of various cultures go about meeting those needs.

An individual professional cannot be culturally competent alone. It requires organizational commitment. Management creates the service delivery structure and environment where cultural competence is possible. Highly individualized and family-centered services increase the level of cultural competency. Culturally competent practice improves access and quality of service for individuals of diverse populations.

#### **IV. Who should receive culturally appropriate services**

The practical standard is that extraordinary effort will be directed toward any cultural group:

- Whose family customs, social patterns, child-rearing practices, and religious values are sufficiently different from the mainstream;
- Whose primary language is not English or whose means of communication is sufficiently different from mainstream as to risk misunderstanding essential elements of the clinical or professional interaction; or



**Marin City Community Development Corporation**  
**CULTURAL COMPETENCE POLICY AND PROCEDURES**

- Whose history of experiencing war or ethnic, racial, social, or class-related discrimination is likely to have produced trauma or stressors beyond the norm.

Civil rights guidelines require agencies receiving federal health and human services funds to augment services or supports when cultural or linguistic factors have contributed to a client's condition or have a bearing on his or her capacity to effectively participate in the agency's services.

Legal requirements apply to linguistic competence. In certain circumstances, organizations that receive federal dollars, directly or indirectly, must translate written materials where a significant number or percentage of the population eligible to be served or likely to be directly affected by the program needs services or information in a language other than English in order to communicate effectively. Oral interpretation services must be of sufficient quantity and quality to meet the needs of all clients with limited English proficiency.

The next question often is this: How much cultural competence is enough? Cultural competence is necessary in all customer encounters. The ability to deliver culturally competent services is key to improving service delivery, program outcomes, and ultimately, tailoring services to meet the participant's goals. Because everyone has a cultural identity, cultural competence must be applied to everyone.

**V. Steps to become more Culturally Competent**

**A. *Being aware of regional, cultural, and demographic shifts***

Southern Marin and the Bay Area's demographics are changing, bringing different cultures and subgroups, each with different needs and requirements. If we are to succeed in serving these individuals, we will need to conduct research, determine what services the diverse groups tell us that they need, create partnerships where possible to avoid service duplication, and train workers in new approaches. Then we will listen to our customers' feedback and make ongoing changes for continuous quality improvement.

Constantly changing cultural and linguistic competence are relevant to MCCDC because of: demographics, health disparities, access barriers, quality of services, legal and accreditation mandates, liability and fiscal efficiency, competition, and service delivery costs.

**B. *Consistently Improving Quality of Services:***

For professionals, developing a relationship of mutual trust and confidence with a customer is critical. As an agency, we provide vitally important services whose very



## Marin City Community Development Corporation

### CULTURAL COMPETENCE POLICY AND PROCEDURES

nature requires the establishment of a close relationship with the participant; a relationship that is based on confidence

and mutual trust. Such relationships depend heavily on the free flow of communication between professional and client. This essential exchange of information is difficult when the two parties involved speak different languages or come from different cultures. Competency in dealing with diverse populations is crucial and lack of it has especially adverse consequences.

Culture influences the first steps that the customer takes in our agency: intake, first appointment, and one-on-one Individual Service Plan development. It will affect next steps as well, such as the accuracy of an assessment, or the effectiveness of other services or program a customer may be enrolled in. For example, if a customer is referred to a career path or vocational training opportunity that they do not necessarily want, due to stereotyping instead of using culturally competent individualized planning. If team members is ignorant of the customer's culture, they may make incorrect assumptions about what direction a customer wants, what is causing a problem, and we may end up provide inappropriate services.

#### ***C. Funding Culturally Competent Services***

Provision of publicly-financed workforce services is increasingly delegated to the private, non-profit sector. Organizations that can improve outcomes for diverse populations, provide equal access to services, and increase client satisfaction will have the competitive edge.

#### **VI. Incremental Approach and Coalition Building**

Building internal-external coalitions helps to develop internal support for cultural competence efforts and promotes the organization's successes to clients and the community. The following coalition building principles may be useful:

- Clients and families are the best advocates for system change. As constituents and customers, they can get attention where professionals may be ignored.
- All stakeholders should be included.
- Dialogues, not training sessions, will be most helpful in learning about people's issues and their perceptions of the organization's services.
- No single leader speaks for an entire community. Get participation from several respected community leaders.

To say that culture alone explains everything is as dangerous as saying culture counts for nothing. Individuals within any particular ethnic or cultural group are different from one another. Values, opinions, and family practices differ. Diversity trainers often say the differences among individuals within a cultural group are greater than the difference between cultural groups. An organization must respond to an individual whose individuality is formed, in part, by the person's culture.



## **Marin City Community Development Corporation**

### **CULTURAL COMPETENCE POLICY AND PROCEDURES**

#### **VII. Culture is not just Race and Ethnicity**

Organizations must be careful not to view culture only as race or ethnicity. Many groups, such as the poor, homeless, disabled, gay/lesbian/bisexual/transgender, and immigrants/refugees exhibit distinct cultural characteristics, which may present special service delivery issues. Poverty imposes demands that can manifest as distinct worldviews that are cultural in nature. While socioeconomic status is independent of race/ethnicity, it has culture-like characteristics for its members and engenders culture-like responses from others. For example, a study of parents describing how families had been treated by child-serving agencies found that low-income parents of all races were almost three-times more likely than others to describe experiences in which they felt they were not treated with respect by service providers.

#### **VIII. Social and Economic Factors**

Commentators in both the social work and health fields draw connections from social and economic factors to outcomes for persons from diverse cultures.

A person's health, for example, is said to be a product of social and economic environment as well as a product of service system competence, and individual factors (such as genes, beliefs, coping skills, and behavior). Socioeconomic factors affecting health include income, education, housing, employment and working conditions, environmental health, crime, and cohesiveness of communities.

###



## Marin City Community Development Corporation

### Duty to Report, Warn or Inform Policy

#### I. Purpose and Policy

It is the policy of MCCDC that all employees are responsible for considering and protecting the health and welfare of the children, seniors and all members of the community during the course of their work.

It is the purpose of this policy to set out a procedure for employees to follow when the employee is involved with a client, a participant's child, or a senior citizen he or she may be responsible for is a victim of abuse or neglect. While the State of California may require that certain professionals have a duty to report, the Marin City Community Development Corporation feels that all employees have a responsibility to report actual or suspected abuse or neglect.

#### II. Definitions

1. "Child abuse" could mean any of the following:
  - a. Physical injury inflicted on a child by other than accidental means;
  - b. Sexual intercourse, contact, lewd or similar behavior with a minor, which refers to sexual assault and sexual assault of a child;
  - c. Sexual exploitation of a child;
  - d. Emotional damage; or
  - e. Forced viewing of adult or inappropriate materials or situations.
2. "Emotional damage" means:
  - a. Harm to a child's psychological or intellectual functioning which is exhibited by severe anxiety, depression, withdrawal, or outward aggressive behavior;
  - b. Failure of a parent, guardian, legal custodian or other person exercising temporary or permanent control over the child to obtain the treatment necessary to remedy the harm;
  - c. A substantial and observable change in behavior, emotional response, or cognition that is not within the normal range for the child's age and stage of development.
3. "Neglect" means:

Failure, refusal or inability on the part of a parent, guardian, legal custodian, or other person exercising temporary or permanent control over a child, senior citizen, or adult dependent **by reasons**

**other than**





## Marin City Community Development Corporation

### Duty to Report, Warn or Inform Policy

**poverty**, to provide necessary care, food, clothing, medical or dental care, or shelter so as to seriously endanger the individual. The definition of neglect may include, but is not limited to: a lack of supervision, including having the dependent at home alone, or total abandonment.

4. "Employee" refers to:

Anyone employed by the Marin City Community Development Corporation in one of the following employed capacities: full-time, part-time, temporary, limited term or on a contractual basis.

5. "Child" means:

A child or minor is defined as a person who is less than 18 years of age. This is relevant to our work, as in some cases MCCDC offers programs for "youth," which may range from minors to individuals up to 24 years of age.

6. "Mandated Reporting" refers to:

The procedure by which an employee relays information pertaining to suspected child abuse, senior neglect, or duty to warn situations to the proper authorities as set out in this policy.

7. "Good faith belief" as used herein means:

Sufficient indications or signs of child abuse or neglect as to cause an employee to believe that abuse or neglect has, is, or may be taking place.

8. "Extreme emergency" is defined as:

An extreme emergency is a situation where there has been physical harm; injuries that may be life threatening or that may worsen and that require immediate medical attention.

### III. Children/Minors

1. All employees who regularly interact with children are responsible for that child's welfare and reporting instances of child abuse or neglect. An example of this would be a minor participating in a Summer Youth

Employment Program.



## Marin City Community Development Corporation

### Duty to Report, Warn or Inform Policy

2. All employees who interact with children, not in the regular course of employment, are also responsible for the welfare of the child or children while in their care. Care, as used here, means having the responsibility of a child or children special occasion, mentorship, or other irregular employment related functions.

3. All staff is required to maintain a high level of consciousness regarding child abuse and neglect and how it is reported.

#### **IV. Seniors / Adult Dependents**

MCCDC does not usually provide direct services to senior citizens. However, staff is required to be aware and vigilant of the potential for senior abuse. If a senior or adult dependent in the care of one of our clients is suspected of being abused or neglected, the same procedures are to be followed. If an incident has happened, or is predicted to happen, if it is credible, then it must be acted upon. Proceed to the Reporting procedure, described in Section VI, below.

#### **V. Other Community Members/Duty to Warn**

Duty to warn refers to the responsibility of a counselor or staff member to inform third parties or authorities if a client poses a threat to himself or herself or to another identifiable individual. Legal duty to warn was established in the case of Tarasoff v. Regents of the University of California, where a therapist failed to inform a young woman and her parents of specific death threats made by a client. The young woman was subsequently killed and her family sued the therapy provider. This was a landmark case, and therefore the concept and practice of duty to warn often referred to as the "Tarasoff ruling."

This judgment was later expanded to include previous records that might indicate a history of violent behavior. The ruling originated from a case in which a doctor conducted a risk assessment of a client, but did not consider the past history of violence. As a result, the client's girlfriend was not warned about the individual's history of violent behavior. This later proved disastrous, and ended in a murder.

Duty to warn guidelines give counselors and staff the right to breach

confidentiality if a client poses a risk to another person. Duty to warn



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protects clinicians from prosecution from breach of confidentiality if they have reasonable suspicion that the client might be a danger to himself or others.

Although there is precedence in the courts, there is no one singular guideline or established law to strictly follow. However, the court system has usually followed these three basic principles in assessing liability:

1. **Foreseeable harm** – For example, a participant makes a verbal or written threat.
2. **Identifiable victim** – The client says who they intend to harm (i.e. a spouse, domestic partner, significant other, senior citizen, parent, child, etc.). The threat must be towards a specific and definable target. This must be a particular person, identifiable persons, or defined property, rather than a general group or category. The threat may be toward the client's self, and could include such stated intentions as self-mutilation, suicide, or even self-neglect.
3. **Feasibility of threat** – This is much more difficult to evaluate, and every effort should be made to be thorough in this process. Examples may include, but are not limited to: the participant has access to a weapon, it is clear they intend to use it, and/or they may have had a history of violence, aggressive, or self-destructive behavior. The threat has to be believable. It should be explicit, not vague. Motives count, as does the client's personal history of behavior.

If these three principles are met, then staff should proceed with the Reporting procedure, described below.

#### VI. Reporting

All reporting by employees in accordance with this policy, which is done so with a good faith belief and substantial compliance with the procedures set out herein shall be protected actions.

- I. Employees understand that there is a balance to be kept—confidentiality of our participants and the services that they have been provided is of extreme importance to our work. Violating confidentiality where there is not clear established cause may expose the agency and the individual to possible lawsuits. But when there is an issue of past or potential



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- abuse or violence as described in these procedures, then safety becomes paramount.
- II. All of the policies set out herein, shall not interfere with mandated timelines; for example, to cause an employee to violate a state reporting requirement.
  - III. Incident Report Forms are to be filled out prior to contacting the Police Department. Forms should be completely filled out with as much specific information as can be obtained and submitted immediately to the supervisor or Executive Director.
  - IV. All employees are required to report to the Police suspected abuse and neglect as defined in this policy.
  - V. In the event of an extreme emergency, the employee shall call 911 prior to making a report to the Police Department.

### VII. Medical emergencies and other life threatening events

It is the policy of the Marin City Community Development Corporation that if one of our customers is in danger from medical or other potentially life threatening emergencies or other serious and imminent harm (i.e. rape, abduction, threats, spousal abuse/domestic violence, etc.) that the employee will treat it as an emergency, calling 911, or other identified service, to protect customers from harm, injury or death. When in the field, working after hours, or without the ability to connect with a supervisor, employees should err on the side of caution—if the need is clear and present, employees should contact the authorities right away, and then when the emergency has passed, they should then contact their supervisor (or other supervisor if the direct supervisor is unavailable) ***immediately***. Incident reports and documentation should be completed describing in detail what happened and how it was resolved.

### VIII. Enforcement

Employees who fail to properly report child abuse, senior neglect, or to act on a duty to warn situation as required within this policy are subject to immediate suspension while the failure to report is investigated. Investigation of failure to report shall be undertaken by the supervisor and the Executive Director and shall be completed in an expeditious manner.

If the investigation determines that the employee has been negligent in reporting, possible corrective action may include additional training, or progressive disciplinary action. Depending on the severity of the incident, this may also include termination of employment.



## **Marin City Community Development Corporation INFORMED CHOICE POLICY AND PROCEDURES**

### **Purpose**

Clients/consumers served by the Marin City Community Development Corporation (MCCDC) are encouraged to make informed choices when selecting their vocational goals, objectives, programs and services, composition of service delivery team, job training and placement opportunities. MCCDC Team Members must be proactive in helping to facilitate client/consumer choice(s). MCCDC clients/consumers will also be informed of other service providers in the area where they may obtain the same or similar services, especially if there are specific providers, community partners, nonprofit agencies or community based organizations (CBOs) that may better meet their needs.

### **Procedures**

MCCDC Team Members must inform clients/consumers and if consent is provided; their families, parents, legal guardians, support systems, or other representatives about available options regarding issues. Issues that must be discussed includes any known information, including: potential cost, accessibility, duration of potential services, qualification of service providers, whether other clients/consumers have been satisfied with services provided by MCCDC, our specific vendors, our specific partners, and whether services are provided in an integrated location. Team Members must inform clients/consumers that communication with other parties including families, parents, legal guardians, support systems, other vendors, etc. is by the client's/consumer's choice as well, and may only be completed through the client's/consumer's signed Release of Information on file at the MCCDC. The client/consumer has the right to choose to withhold such a release. Information shall be provided to help clients/consumers make informed choices. Informed choice is an important component of the Individual Service Plan (ISP) development process, as well as throughout programming and service delivery.

Marin City Community Development Corporation encourages and supports client/consumer choice, as long as, the choice does not violate any laws, requirements, existing policies and procedures, or similar guidelines. Programs and services selected by the client/consumer must also be relevant to the achievement of their vocational goal.

Clients/consumers served by MCCDC may choose between vendors and partners when there is more than one approved vendor or partner to provide the needed service(s).

A client/consumer who is denied the right to make an informed choice, regardless of the reason(s), must be informed of the right to appeal the decision not to allow the preferred choice(s). The client/consumer must also be reminded of the availability of MCCDC consumer comment and feedback policies, agency grievance procedures, as well as other avenues to communicate their concerns. They also have the right to communicate through advocates, other representatives, and referring agencies.



## **Marin City Community Development Corporation INFORMED CHOICE POLICY AND PROCEDURES**

Resources that MCCDC Team Member may utilize in discussing choice(s) with clients/consumers include but are not limited to:

- Individual Service Planning Sessions;
- One-one-one Counseling Appointments;
- Group Information Sessions;
- Client/consumer Satisfaction Surveys;
- Information produced by school districts, colleges, vocational schools, and other relevant service providers;
- Newsletters from MCCDC, partners, vendors, stakeholders, and other Community Based Organizations;
- Program and services fliers, brochures, outreach materials, and other information from other organizations; and
- Relevant Accreditation, Certification, or other information relating to the Qualifications of Service Providers.

Whenever Team Members have questions about additional options or training opportunities on providing consumer choice, they are encouraged to contact their immediate supervisor or Executive Director for additional support.



## **Marin City Community Development Corporation**

### **NO HARASSMENT POLICY AND PROCEDURES**

We are committed to providing the best possible climate for maximum development and goal achievement for all team members. Our practice is to treat each team member as an individual. We seek to develop a spirit of teamwork; individuals working together to attain a common goal.

To maintain an atmosphere where these goals can be accomplished, we provide a comfortable and progressive workplace. Most importantly, we have a workplace where communication is open and problems can be discussed and resolved in a mutually respectful atmosphere. We take into account individual circumstances and the individual team member.

We firmly believe that with direct communication, we can continue to resolve any difficulties that may arise and develop a mutually beneficial relationship.

MCCDC does not and shall not discriminate on the basis of race, color, religion, creed, gender, gender expression, age, national origin, disability, marital status, sexual orientation, or military status, in any of its activities or operations. These activities include, but are not limited to, hiring and firing of staff, selection of volunteers and vendors, and provision of services. We are committed to providing an inclusive and welcoming environment for all team members, clients, client, contractors and volunteers.

MCCDC is an equal opportunity employer. We will not discriminate and will take affirmative action measures to ensure against discrimination in employment, recruitment, compensation, termination, upgrading, promotions and other conditions of employment against any team member or job application on the bases of race, color, gender, national origin, age, religion, creed, disability, veteran's status, sexual orientation, gender identity or gender expression.

#### **No Harassment and Retaliation**

MCCDC is committed to providing equal employment opportunities and a discrimination, harassment-, and retaliation-free environment. MCCDC does not tolerate and prohibits discrimination, harassment, or retaliation of or against its job applicants, contractors, interns, volunteers, or team member by any other MCCDC team member, supervisor, vendor, client, or any third party on the basis of race, religious creed (including religious dress and



## Marin City Community Development Corporation NO HARASSMENT POLICY AND PROCEDURES

grooming practices), color, age, sex, sexual orientation, gender, gender identity, gender expression, national origin, ancestry, marital status, medical

condition (including, but not limited to cancer, genetic characteristics, HIV and AIDS), disability, family and medical care leave request or status, disability (mental and physical), marital status, military and veteran status, national origin, pregnancy, child birth, or

breastfeeding status (or any related medical status), or any characteristic protected by applicable federal, state, or local laws or ordinances.

We prohibit harassment of one team member by another team member, supervisor or third party for any reason.

In California, the following also are a protected class: race; religious creed; color; national origin; ancestry; physical disability; mental disability; medical condition, including genetic characteristics; genetic information; marital status; sex; pregnancy, childbirth or related medical conditions; perceived pregnancy; actual or perceived gender; gender identity or expression; sexual orientation; civil air patrol membership; service in the military forces of the State of California or of the United States; military and veteran status; lawful conduct occurring during nonworking hours away from company premises; and age 40 or over. Included in the definition of each protected category is the perception of membership in a protected category and an individual's association with an actual or perceived member of a protected category.

### **1. Discrimination Defined**

Discrimination under this policy means treating an individual differently or denying a benefit to an individual because of the individual's protected characteristic.

### **2. Harassment Defined**

Harassment under this policy means unwelcome verbal, visual or physical conduct creating an intimidating, offensive, or hostile work environment that interferes with work performance. Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or





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teasing), graphic (including offensive photos, symbols, jokes, videos, drawings, emails, or computer displays) or physical conduct (including but not limited to physically threatening another, blocking another's way, or mimicking the other on account of his/her protected characteristic) that denigrates or shows hostility or aversion towards and individual or group because of any protected

characteristic. Such conduct violates this policy even if it is not unlawful. Because it is difficult to define unlawful harassment, team members are expected to behave in a professional and respectful manner at all times.

#### 3. Sexual Harassment Defined

Sexual harassment can include all of the above actions, based on sex, gender, gender identity or expression, or sexual orientation, as well as other unwelcome conduct, such as unwelcome or unsolicited sexual advances, requests for sexual favors, conversations regarding sexual activities, other verbal or physical conduct of a sexual nature.

**Violation of this policy will result in disciplinary action, up to and including immediate termination.**

If you have any questions about what constitutes harassing behavior or what conduct is prohibited by this policy, please discuss the questions with a member of management or one of the contacts listed in this policy. At a minimum, the term

“harassment” as used in this policy includes any of the following activities pertaining to an individual’s protected class:

- Offering an employment benefit (such as a raise, promotion, career advancement, or other favorable treatment) in exchange for sexual favors, or threatening negative treatment (such as termination or demotion) for refusal to provide sexual favors;
- Offensive remarks, jokes, slurs, threats, degrading words, whistling, leering or verbal conduct;
- Offensive comments concerning a person’s characteristics such as pitch of voice, facial hair or the size or shape of a person’s body, including remarks that a male is too feminine or a woman is too masculine;
- Offensive pictures, drawings, photographs, figurines, writings, or other graphic images, conduct, or communications, including text messages,

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instant messages, websites, invitations, voicemails, social media postings, e-mails, faxes, videos, and copies;

- Offensive sexual remarks, sexual advances, or requests for sexual regardless of the gender, gender identity or expression, or sexual orientation of the individuals involved; and
- Offensive physical conduct, including touching, gestures, blocking normal movement, groping, assault regardless of the gender, gender identity or expression, or sexual orientation of the individuals involved.

**4. Retaliation Defined**

Retaliation means adverse action taken because an individual reported or complained of an actual or perceived violation of this policy, ordinance, or any local, state or federal law. "Adverse Action" includes, but is not limited to:

- Shunning and avoiding an individual who reports or complains of harassment, discrimination or retaliation.
- Express or implied threats or intimidation intended to prevent an individual from reporting harassment, discrimination, or retaliation.
- Denying employment benefits or less-favorable terms or conditions of employment to an individual who has, or who is believed to have, reported or complained of discrimination, harassment, retaliation, or other violation of an ordinance, local, state, or federal law, participated in an investigation by a state or federal agency, or participated in the reporting and investigation process described herein.

We also absolutely prohibit retaliation, which includes: threatening an individual or taking any adverse action against an individual for 1) reporting a possible violation of this policy, or 2) participating in an investigation conducted under this policy.

**5. Reporting Discrimination, Harassment, or Retaliation****Marin City Community Development Corporation**

All members of management are covered by this policy and are prohibited from engaging in any form of harassing, discriminatory, or retaliatory conduct. No member of management has the authority to suggest to any applicant or team member that employment or advancement will be affected by the individual entering into (or refusing to enter into) a personal relationship with any member



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of management, or for tolerating (or refusing to tolerate) conduct or communication that might violate this policy. **Such conduct is a direct violation of this policy.**

Even non-team members are covered by this policy. We prohibit harassment, discrimination, or retaliation of our team members in connection with their work by non-team members. Immediately report any harassing or discriminating behavior by non-team members, including vendors, clients, and team members of contractors or subcontractors. Any team member who experiences or observes harassment, discrimination, or retaliation should report it using the steps listed below.

The following procedures have been put into place to ensure that the MCCDC workplace is respectful, professional, and free of discrimination, harassment, and retaliation. If you believe that you have been discriminated against, harassed, or retaliated against, or have observed such violations toward another individual, you should immediately inform the Team Member's supervisor, a member of the MCCDC Human Resources Department, or Executive Director.

If any of the individuals listed above is the person you believe has violated this policy, you should contact any higher-level manager in your reporting chain, a member of the Personnel Committee, or the President of the Board of Directors. **(Complainant should complete a formal Sexual Harassment Claim Form).**

Any Team Member who makes a complaint under this policy and has not received a satisfactory response from the Executive Director within five (5) business days should immediately contact a member of the Personnel Committee or Board of Directors:

- Jessica Shavers, Chair of Personnel Committee:  
Tel: (415) 755-7422  
[Email: jessicashavers@gmail.com](mailto:jessicashavers@gmail.com); or
- Michael Tabb, President of the MCCDC Board of Directors:  
Tel: (415) 298-1171  
[Email: tabbclear@yahoo.com](mailto:tabbclear@yahoo.com)

**You should report any actions that you believe may violate our policy no matter how slight the actions may seem.**



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### NO HARASSMENT POLICY AND PROCEDURES

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We will investigate the report and then take prompt, appropriate remedial action. The company will protect the confidentiality of team members reporting suspected violations to the extent possible consistent with our investigation.

**You will not be penalized or retaliated against for reporting improper conduct, harassment, discrimination, retaliation, or other actions that you believe may violate this policy.**

We are serious about enforcing our policy against harassment. Persons who violate this or any other company policy are subject to discipline, up to and including termination. We cannot resolve a potential policy violation unless we know about it. You are responsible for reporting possible policy violations to us so that we can take appropriate actions to address your concerns.

All supervisors must immediately report any complaints of misconduct under this policy to the Executive Director or Human Resources Department so that MCCDC can investigate and try to resolve the complaint. If the report or complaint concerns the Executive Director or a member of the Human Resources Department, the supervisor should report the complaint to the President of the MCCDC Board of Directors, as listed above.

#### **6. Investigation Procedures**

All complaints of discrimination, harassment, or retaliation that are reported to any of the persons identified above will be investigated as promptly as possible, and corrective action will be taken where warranted. To the extent possible, MCCDC will work to keep the reporting team member's concerns confidential. However, complete confidentiality may not be possible in all circumstances, which will be balanced with the need to conduct an adequate investigation.

Complaints will be investigated by impartial and qualified internal personnel, unless external involvement is warranted. The process will be documented and tracked for reasonable progress, and all investigations will be timely.

During the investigation, MCCDC will generally interview the complainant and the accused, conduct additional interviews as needed, and review any relevant documents or other information. Upon completion of the investigation, MCCDC shall determine whether this policy has been violated, based upon its reasonable evaluation of the information gathered



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during the investigation. MCCDC will inform the complainant and the accused of the results of the investigation.

MCCDC will take corrective action against any person whom MCCDC finds to have violated this policy. Such measures may include, but are not limited to, counseling, suspension, or immediate termination. Anyone, regardless of position or title, whom MCCDC determines has violated this policy, will be subject to discipline, up to and including termination. Any supervisor or manager who condones or ignores potential

violations of this policy will be subject to appropriate disciplinary action, up to and including termination. In addition, under California law, employees may be held

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personally liable for harassing conduct that violates California’s Fair Employment and Housing Act.

The California Department of Fair Employment and Housing (“DFEH”) and U.S. Equal Opportunity Commission (“EEOC”) may also investigate and process complaints of harassment or discrimination. Team members may also make complaints directly to either agency. Violators are subject to penalties and remedial measures that may include sanctions, fines, injunctions, reinstatement, back pay and damages.

Any team member wishing to contact the DFEH may call, visit, or email/write to the office listed below:

**DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING**  
**2218 Kausen Drive, Suite 100**  
**Elk Grove, CA 95758**  
**Communication Center: (800) 884-1684**  
**Main: (916) 478-7251**  
**Email: email [contact.center@dfeh.ca.gov](mailto:contact.center@dfeh.ca.gov)**

The nearest DFEH or EEOC office for each agency is also listed in the telephone book or can be found by visiting the respective agency websites at:



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- [www.dfeh.ca.gov/offices.htm](http://www.dfeh.ca.gov/offices.htm); and
- [www.eeoc.gov/field/index.cfm](http://www.eeoc.gov/field/index.cfm)

It is unlawful for an employer to retaliate against employees who oppose the practices prohibited by the FEHA, or who file complaints or otherwise participate in an investigation, proceeding or hearing conducted by the DFEH or EEOC. Similarly, MCCDC prohibits team members from hindering its internal investigations or its internal complaint procedure.

Remember, preventing and remedying discrimination, harassment, and retaliation is a team effort. Team member's notification to MCCDC is essential to enforcing this policy. MCCDC cannot remedy claimed violations unless they are brought to management's attention.



## Marin City Community Development Corporation

### Notice of Privacy Practices

**THIS NOTICE DESCRIBES HOW CONFIDENTIAL INFORMATION ABOUT YOU MAY BE USED AND DISCLOSED AND HOW YOU CAN GET ACCESS TO THIS INFORMATION. PLEASE REVIEW IT CAREFULLY.**

The Marin City Community Development Corporation (hereafter either "MCCDC" or "the Agency") is required by law to maintain the privacy of your information and to provide you with notice of its legal duties and privacy practices. If you have questions about any part of this notice or if you want more information about the privacy practices at the Agency please ask your counselor. If you need additional support, please contact the Privacy Officer listed at the end of this notice.

**Effective Date of This Notice: February 13, 2020**

#### **I. How the Agency may use or disclose your information**

The Agency collects information from you (hereinafter referred to as 'you') to provide you with a variety of program services. For example, these services may include such things as vocational training, situational assessments, work adjustment, or job placement services.

The Agency protects the privacy of your information. We only use or disclose your information for the following purposes:

1. Regular Agency Operations. We may use and disclose information about you for Agency operations. These uses and disclosures are necessary to run the Agency. This may include accounting, operations, etc. For example, we may disclose information to how many hours you have participated in a given service, if it is eligible for a stipend payment. If we could not disclose this information internally, this service could not otherwise be delivered to you.
2. Communication with your family, support system, or designee. We will offer you the opportunity to provide written consent to disclose your information to others who you may wish to assist you in your services here at MCCDC. This may include (after written authorization) notifying a family member, significant other, your personal representative or another person you designate involved in your program about your program progress.
3. Program Evaluation and Development. We may use your information, such as job placement, retention, wage, or other relevant data to determine if certain programs are effective, what services are not needed, future program developments, and/or for refining existing programs so that they can be more efficient and effective.
4. Emergencies. As required by law and to protect your health and safety, we may disclose your information to public authorities for purposes related to things such as: injuries and emergencies.
5. Payment. We may use and disclose information about you so that services you receive at the Agency may be billed and payment may be collected from referral organizations, governmental agencies, third parties, or other payors. For example, we may share your vocational information with the State of California Department of Rehabilitation to enable us to bill for services delivered (if you were referred from the state DOR).
6. Oversight activities. We may disclose your information to agencies or other organizations during the course of audits, inspections, licensure, accreditation processes and other proceedings.
7. Required by law. As required by law, we may use and disclose your information. There may be extremely rare cases where information reported to us must be disclosed to the authorities, such as reporting child abuse, elder neglect, domestic violence, or other incidents, including imminent threat to the health or safety of a particular person or the general public.
8. Law enforcement. When required by law, we may disclose your information to a law enforcement official for purposes such as identifying or locating a suspect, fugitive, material witness or missing person, complying with a court order or subpoena and other law enforcement purposes.
9. Outreach. We may contact you to provide meeting/appointment reminders or to give you information about other programs or services that may be of interest to you.
10. Marketing. We may request that you participate in marketing and publicity for the Agency. It is completely voluntary, and is in no way a requirement to receive services. MCCDC uses marketing and publicity to expand and improve the services and programs we provide the community.



## Marin City Community Development Corporation

### Notice of Privacy Practices

#### **II. Changes to this Notice of Privacy Practices**

The Agency reserves the right to amend this Notice of Privacy Practices at any time in the future, and to make the new provisions effective for all information that it maintains, including information that was created or received prior to the date of such amendment. Until such an amendment is made, the Agency is required by law to comply with this Notice. We will post a copy of the current Notice in the Agency. In addition, we will offer you a copy of the current notice with the next program enrollment or enrollment packet.

#### **III. Additional clarification and/or Complaints**

For additional information, please contact the Privacy Officer: Harald Junker, Marin City Community Development Corporation, 441 Drake Avenue Marin City, CA 94965





## Marin City Community Development Corporation PARTICIPATION AGREEMENT and PROGRAM RULES

We look forward to working with you and in order to ensure success in your individualized service with the Marin City Community Development Corporation (MCCDC), we ask that you follow these basic steps to fully participate in all of MCCDC's programs. **All customers are expected to:**

- > Finish all assessments.
- > Complete all required orientations.
- > Keep your appointments, or provide advance notice when possible that you are unable to attend.
- > Supply all necessary documentation.
- > Fully cooperate with your counselors and MCCDC staff.
- > Always be thinking about what you are bringing to the table to assist yourself in succeeding, as well as allowing MCCDC to better help you.

***Prohibited Behaviors/Program Rules: For the safety and comfort of all, MCCDC will discontinue services to any person who:***

- > Shows abusive language or behavior toward staff, program partners, volunteers, visitors or other program participants.
- > Arrives under the influence of alcohol or drugs (this does not include prescribed medications taken according to doctor's orders).
- > Performs any violent acts or actions that endanger the health and safety of others, or threatens such actions.
- > Vandalizes, steals or defrauds MCCDC or an employee of MCCDC or their property.
- > Brings any weapons (including knives) to program or employer host/training site.
- > Harasses staff or other program participants, intentionally gives false information that specifically qualifies you for the services you are receiving.
- > Vandalizes, steals or defrauds from an individual or company where MCCDC has referred or placed you (such as an employer, landlord or other service provider).



## Marin City Community Development Corporation PARTICIPANT EQUIPMENT USE AGREEMENT

Marin City Community Development Corporation (MCCDC) computers, fax machines and copy machines and other equipment are available for job search, housing search, education, and improving literacy skills. Any other use is considered inappropriate and not acceptable.

### **I agree with the following rules for using MCCDC equipment. I will:**

- Not create or view any documents or web pages on the computers that may be considered offensive to others in the office, including documents that describe sexual activity or nudity or that insult a person's gender, race, ethnicity, religion or sexual orientation.
- Not install or download software onto the computers without staff approval, nor will I remove any existing programs or documents.
- Not alter, add, or remove any hardware from the computers.
- Check all floppy disks, CD's, memory sticks, thumb drives, etc. for viruses and request assistance from staff if I do not know how to do this.
- I will not change any basic or advanced settings on the computers.
- If I have a problem with any equipment, I will immediately ask staff for assistance.
- Take care in protecting the equipment from food, drink, and physical damage, which includes not having any food or liquids near or around the computers or equipment.
- Protect the confidentiality of any participant information stored on the computer or transmitted electronically or by fax.
- I will use the telephones, fax machines and copiers only for Job Search, Housing Search or educational/literacy activities. I will not make or receive any personal phone calls or personal faxes or make any copies unrelated to my housing or job search.

Any participant who abuses the privilege of using MCCDC's equipment may be banned from further use of the equipment and, depending on the seriousness of the infraction, may be terminated from receiving services.

I have read and understand these rules and I understand that by not following them, I may lose access to the equipment for a defined duration, or indefinitely, as determined by MCCDC staff, *depending on the severity of the infraction.*



## Marin City Community Development Corporation

### PARTICIPANT GRIEVANCE PROCEDURES

The Marin City Community Development Corporation (MCCDC) has created this grievance procedure to help you resolve difficult situations or problems you experience in your services. If you believe that the terms or conditions of your participation in program activities are unfair or that your rights have been denied, you have a right to utilize any or all of the steps outlined in this procedure. You may present a grievance without fear of retaliation.

If you would like, a neutral staff person can assist you with your grievance; for example, we can help you to find someone outside of the agency to work with you. They will help you write your grievance, informing you of the requirements for filing and your rights. The grievance will be conducted in writing and will follow each step in order and within the timeframe specified. You may stop your grievance at any point.

1. Please first discuss your problem with the staff person(s) involved. If that does not solve your concerns, then ask for additional help, such as from a different staff member, or ask for a supervisor.
2. If that does not resolve the matter, ask for a meeting with the Enterprise Development Director so that you can discuss the issues. They will try to find a solution that satisfies the concern.
3. The next step would be to submit your grievance in writing to the Enterprise Development Director. The Enterprise Development Director will respond in writing within ten working days of receiving your grievance.
4. If you are not satisfied with the Enterprise Development Director's response, you may take your grievance to the Executive Director. Write the Executive Director within ten working days of receiving the Enterprise Development Director's response. The Executive Director will respond in writing within ten working days.
5. Finally, if you are not satisfied with the Executive Director's decision, you may submit your written grievance to the agency's Board of Directors Chairperson, or if unavailable, the Board's Vice Chair. Within ten working days of receiving the Executive Director's response. Giving 10 calendar days notice, the Board will notify you in writing of the time and place of your hearing, which will occur within 30 days of the filing of your grievance. Within 60 days of the filing date, the Board will notify you in writing of its decision.

**IMPORTANT:** All grievances must be made in writing within one month of the alleged occurrence, except grievances alleging fraud or criminal activity. If you leave or are discharged from the program before your grievance is filed or satisfied, it will be your responsibility to conduct your grievance on your own or with the assistance of an advocate of your choice. Grievance and/or appeals information will be provided to you at your request. These procedures shall not be construed as affecting any other legal remedy outside this grievance process.

Department of Rehabilitation consumers may contact the Client Assistance Program (CAP) at (800) 952-5544 (voice), or (866) 712-1085 (TTY). Additionally, you may ask MCCDC staff or your Department of Rehabilitation counselor for assistance.

Other sponsoring agencies may also have specific grievance procedures as well.



## **Marin City Community Development Corporation**

### **RIGHTS OF PERSONS SERVED POLICY**

#### **POLICY**

Information related to the rights of the persons served will be regularly and appropriately communicated to all clients (and family members and legal representatives if appropriate), staff and volunteers. This information is included in the Marin City Community Development Corporation Client Bill of Rights and in the detailed information following this section.

All persons served by Marin City Community Development Corporation (MCCDC) have the right to be treated with respect and dignity at all times. Each person will be informed of his or her rights at the earliest possible time. MCCDC is committed to supporting and protecting all of the fundamental human, civil, constitutional, and statutory rights of each person it serves.

MCCDC seeks to help each person served to be an informed consumer and as active a participant as possible in those services. Their privacy and right to confidentiality will be carefully protected. They will be informed of their rights and how to exercise them and how to file a grievance when they believe they have not received proper treatment. The printed Bill of Rights and Responsibilities that appears below will be posted and it or an abbreviated version of it will be given and explained to each person at the point of admission into MCCDC' services.

#### **Marin City Community Development Corporation Client Bill of Rights**

Clients of MCCDC have the right:

1. to be treated with dignity and respect;
2. to make personal choices;
3. to receive quality care;
4. to understand and access information that is about them;
5. to privacy;
6. to have personal information handled with confidentiality;
7. to safety and security;
8. to be treated equally, free from discrimination; and
9. to speak up and be heard;
10. to file a grievance; and
11. to provide input regarding the content of their individual service plan (ISP) and service delivery process.



## Marin City Community Development Corporation

### RIGHTS OF PERSONS SERVED POLICY

#### PROCEDURES

1. The MCCDC Client Bill of Rights will be posted at each program site.
2. The Rights of Person Served Policies and the Client Bill of Rights will be made available to all clients (and family members or representatives if appropriate) of the MCCDC, and will be reviewed with clients as required.
3. All team members and volunteers are required to make a conscientious commitment to the MCCDC Client Bill of Rights and ethical codes of conduct by signing the *MCCDC Professional Business Code of Conduct and Ethics Form* upon the commencement of employment and will be oriented to all Rights of Persons Served Policies during the hiring and onboarding process.
4. All team members shall promote the safety of persons served, other team members and volunteers (see MCCDC Safety Manual).
5. Persons served have the right to make a written formal complaint using the *MCCDC Formal Grievance Form*.

#### INFORMED CHOICE

To enable persons seeking or about to receive services to make an informed choice, they, or their parents or legal guardians if they are minors or unable to understand, will be given full written information about the program during the first or earliest possible contact with MCCDC, which will be explained in a language or form that they can understand.

#### PARTICIPATION IN PLANNING

Persons served and their families will have the right to participate fully in the assessment, individualized service or treatment planning, and plan evaluation and revision processes that take place in their cases, as spelled out in the Individual Services Plan (ISP). Each person receiving services has the right to ask for and receive information regarding his or her care and treatment, to have the service plan reviewed regularly, and to be increasingly involved in the planning. Persons receiving services who are not able to participate fully in service planning, or their families as appropriate, will be informed in advance about the benefits and risks of, and alternatives to, planned services to be administered by MCCDC.



## **Marin City Community Development Corporation**

### **RIGHTS OF PERSONS SERVED POLICY**

#### **CONFIDENTIALITY**

The protection of the confidentiality of information regarding persons served is the obligation of MCCDC and all of its representatives. All personnel will receive training around confidentiality issues and sign statements indicating their understanding of the requirements and their agreement to abide by MCCDC policy, as spelled out in the Code of Ethics document.

#### **GRIEVANCES**

Any individual, family, or child receiving services from MCCDC has the right to be heard on grievances related to his or her services or treatment by the agency. It is MCCDC policy that IMMEDIATE attention will be given to all grievances from persons served. For the purpose of this policy, a grievance is considered to be a complaint by a person served or his/her family regarding a problem in service delivery that is substantial and cannot be resolved in the initial contact regarding it. The process for handling complaints or grievances from persons served is detailed below. Any child or family who files a grievance will be able to do so without fear of retaliation. Each grievance will be resolved as quickly as possible and the person served will be informed of the resolution. The person served will also be informed of his or her right to file a complaint with the referring or placing agency or public contractor involved in the case, if applicable. Grievances will be reviewed as part of the Quality Improvement process. Any patterns or problematic cases that may result in liability for MCCDC will be brought to the attention of the Board through that process.

#### **PROHIBITED INTERVENTIONS**

Personnel providing MCCDC services are not permitted in any situation to use manual, chemical, or mechanical restraint; sustained isolation; or locked seclusion; or any other restrictive behavior management intervention with persons receiving services. MCCDC team members shall not directly handle the funds of persons served



## Marin City Community Development Corporation

### SAFETY OF PERSONS SERVED POLICY

The purpose of this policy is to ensure the safety of persons served as well as team members during transportation and include the provisions for handling emergency situations. When transportation is the responsibility of MCCDC, team members will assist in transporting, handling, and transferring persons served in a safe manner. Copies of consumer emergency information and team member insurance verification are maintained in all company and personal vehicles.

#### Procedure

- A. Upon employment, team members are informed of the requirement that they must hold a valid driver's license, appropriate insurance, maintain a safe driving record and pass a motor vehicle request through MCCDC's insurance provider. Team member may also be required to complete additional training on safe transportation procedures.
- B. The HR/ Office Manager will ensure the safety of company-owned vehicles, equipment, supplies, and materials owned or leased by the company and will maintain these in good condition. Standard practices for vehicle, equipment, supplies, and materials maintenance and inspection will be followed. If the vehicle you are driving is not working properly or requires any kind of maintenance notify the HR/ Office Manager as soon as possible.
- C. Team members will transport persons served with a program vehicle if available. If there is no program vehicle, team members will attempt to use public or contracted transportation. If those options are unavailable, team members will use their own vehicle for transportation of persons served.
- D. For contracted transportation, the HR/ Office Manager, will ensure that all required documentation is completed and submitted before the first trip is scheduled. Team members will arrange ongoing use of contracted transportation or will assist persons served, as needed, in arranging transportation for themselves.
- E. When dropping off persons served at a site which requires a change in team member MCCDC transporting team members will ensure that another responsible party is present before leaving the person served unless otherwise specified in the person's Individual Support Services Plan. Any necessary information will be presented to the team member or other responsible party.
- F. In accordance with state laws, anyone riding in a moving vehicle must wear seatbelts.
- G. Team members are prohibited by state law (California Statutes) to compose, send, or receive an electronic message while operating a motor vehicle. This includes a program vehicle or a team member person's own vehicle. An electronic message (as



## Marin City Community Development Corporation

### SAFETY OF PERSONS SERVED POLICY

defined by state law) “means a self-contained piece of digital communication that is designed or intended to be transmitted between physical devices. An electronic message includes, but is not limited to, e-mail, a text message, an instant message, a command or request to access a World Wide Web page, or other data that uses a commonly recognized electronic communications protocol. An electronic message does not include voice or other data transmitted as a result of making a phone call, or data transmitted automatically by a wireless communications device without direct initiation by a person.”

- H. Persons served using wheelchairs will be transported according to manufacturer’s safety guidelines. This includes, but is not limited to, safe operation and regular maintenance of lift equipment, checks of straps to secure the wheelchair to the floor of the vehicle, and use of adaptive seating equipment (i.e. headrests, lap trays) when appropriate. Team member who are transporting persons served and who complete “tie-downs” of wheelchairs will receive training on how to do so and will be required to demonstrate competency prior to transporting persons using wheelchairs.
- I. Team members will receive training on each person’s transferring or handling requirements for the person and/or equipment prior to transferring or transporting persons. All transfers and handling of persons served will be done in a manner that ensures their dignity and privacy. Any concerns regarding transportation, transfers, and handling will be promptly communicated to the HR/ Office Manager who will address these concerns. This will be done immediately if the health and safety of the person(s) served are at risk.
- J. When equipment used by a person served is needed, team member will place the equipment in a safe location in the vehicle such as the trunk of a car. If a program vehicle does not have a designated storage space such as a trunk, team member will place the equipment in an area of the vehicle and secure it, when possible, so that there is limited to no shifting during transport.
- K. If there is an emergency while driving, team member will follow emergency response procedures to ensure the person(s) safety. This will include pulling the vehicle over and stopping in a safe area as quickly and as safely as possible. Team member will use a cell phone or any available community resource to contact “911” for help if needed. If a medical emergency were to occur, team member will call “911” and follow first aid and/or CPR protocols according to their training.
- L. While transporting more than one person served and person to person physical aggression occurs, team member will pull over and stop the vehicle in a safe area as quickly and as safely as possible, redirect the persons served, and if necessary, attempt to contact another team member, the Program Manager and/or HR/ Office Manager, or “911” for assistance.





## Marin City Community Development Corporation

### SAFETY OF PERSONS SERVED POLICY

- M. Persons served are prohibited from driving program or team member vehicles at any time.
- N. Alcohol, drugs (prescription and over the counter), attitude, emotions, drowsiness and fatigue should not be combined with driving. Do not operate a vehicle on company business hours under any of these conditions. If you believe you should not be driving, find a team member to fill- in for you and notify your Supervisor immediately.
- O. Always turn off the vehicle, applying parking brake and remove the keys from the ignition whenever exiting the van for ANY reason.
- P. Keys must be returned to the designated area upon completion of vehicle use. If using a vehicle any other time than a normal route or community job, please notify receptionist or supervisor of vehicle use/destination/ passengers.
- Q. The first aid kit must be in the vehicle at all times, if you use supplies, be sure to replace them or notify a Program Manager.
- R. No drinking, eating or use of tobacco products (cigarettes, chewing tobacco, etc.). Bottled water may be used. This applies to team member and consumers.
- S. In the event you receive a moving violation/citation at any time, during work or non-work hours, please inform your Supervisor or Executive Director immediately as this will affect our insurance liability. If MCCDC's insurance provider is unable to insure a team member after a traffic violation, their tenure with the company is at their Supervisor's (or designee) discretion.



## Marin City Community Development Corporation

### SAFETY TRAINING MANUAL

The purpose of this manual is to assist customers, volunteers and interns of the Marin City Community Development Corporation in making good decisions when responding to emergency situations. It contains safety procedures, specific evacuation information other important information.

To increase your own safety and the safety of others, become familiar with the contents of this manual before an emergency arises. Know where to go when evacuating the building becomes necessary, and how to assist others.

The Marin City Community Development Corporation's overall goal is to ensure that everyone is able to secure the physical safety of themselves, their families and their homes.

#### I. GENERAL EVACUATION PROCEDURES

1. Marin City Community Development offices are on one level. There is one main doorway that can be utilized to exit the building.
2. Follow instructions from Fire and Rescue authorities or from authorized MCCDC staff – they are there for your safety.
3. Designated Meeting Point: All Staff and guests should meet on the grassy area, immediately behind the office, next to the fence (across from the middle school).
4. In the event the Designated Meeting Point described above, is not deemed to be safe, the Alternate Meeting Point will be the Cornerstone Church, located across the street from our offices.

#### II. EARTHQUAKE RESPONSE PROCEDURE

The actual movement of the ground in an earthquake is seldom the direct cause of death or injury. Most casualties result from falling objects and debris because the shocks can shake, damage or demolish buildings. Earthquakes usually occur without warning. If there is time, people should cover their heads and shoulders and try to protect themselves from falling objects or shattered glass.

##### IMMEDIATE RESPONSE

On detection of an earthquake, remain in place. Remain calm. Think through the consequences of any action. Try to calm and reassure others.

If inside, STAY inside and do the following:

- Remain calm
- DO NOT rush to the exits



## Marin City Community Development Corporation

### SAFETY TRAINING MANUAL

During the shaking:

- **DUCK - Crouch**
- **COVER - Crawl under desk**
- **HOLD - hold on to something until shaking stops**

After the initial shock has subsided:

- All Staff and guests shall leave the building and head to established evacuation routes whenever possible.
- On-Site Incident Commander shall direct Staff and guests to designated assembly areas, and stay clear of utility lines, trees, or falling objects.
- On-Site Incident Commander will assess needs of staff and guests and report to the official emergency authorities.

If outside, stay in the open:

- Remain calm.
- Stay away from buildings, overhead power lines or any other object at risk of falling
- Move away from fire and smoke.
- Proceed to designated assembly area.

#### **Additional Precautions:**

- Beware of items tumbling off shelves and closets as doors are opened.
- Do not eat or drink anything from open containers near shattered glass.
- Do not use candles, lighters, or open flames.
- Avoid using your telephone so that lines are free for emergency services.

### **III. FIRE OR SMOKE PROCEDURE**

#### **GENERAL**

In the event of a fire or smell of smoke, Staff will be notified verbally. If any member of the Staff identifies a fire, they are to immediately notify other members of the Staff and other building occupants.

#### **IMMEDIATE RESPONSE**

If a fire is observed and the fire is small, immediately notify staff. If staff is not immediately available, call 911 and then evacuate the building.

**Building evacuation:** When evacuating, walk. Do not run. Try to remain calm. Do not attempt to fight the fire! Take all personal belongings with you if possible. If you need to pass through smoke, crawl low. Go to the safe area or Designated Meeting Point outside the building and wait for the emergency response personnel, and/or instructions from the Fire Warden.

**If or when you are trapped inside a room,** close the door and stuff the spaces around the door to keep the smoke from entering inside the room. If possible, put a wet cloth in your mouth to serve as a filter. Wait by the window and signal for help. You can use a towel, cloth, and other things that can be easily noticed and seen.



## Marin City Community Development Corporation

### SAFETY TRAINING MANUAL

**If your clothing catches fire**, do not run. Instead stop, drop, and roll!

#### IV. POWER OUTAGE RESPONSE PLAN

Power outages can affect various functions, operations and equipment. Power outages can be short term, or long term.

##### PROCEDURE

Stay Calm.

Assess the extent of the outage in the area. Use extreme caution, especially in areas that are not well lit. Use flashlights instead of candles or lighters to minimize fire hazards.

The Warden will notify customers if and when an evacuation is required. If the Warden asks you to leave the building, lock and secure your area, collect your personal belongings and leave the premises. Do not reenter the building until notified by the Warden.

#### V. FLOOD RESPONSE PLAN

Flash flood waves move at incredible speeds, and can reach heights of 10 to 20 feet. They often come without warning, and can often be deadly.

##### If a flash flood warning is issued:

- Listen to your local radio and television for reports of flooding in progress from the National Weather Service
- Be prepared to move out of danger's way at a moment's notice
- Watch for signs: heavy rain, lightning, thunder
- Move to high ground as fast as you can

##### When you receive a Flood Warning:

- Listen to a battery-operated radio for the latest storm information.
- If local authorities instruct you to do so, turn off all utilities at the main power switch and close the main gas valve.
- If told to evacuate the office were the flood has occurred, do so immediately.
- Move essential items, valuable papers, etc. to high areas that are least likely to be reached by rising water.
- Floodwaters may carry raw sewage, chemical waste and other disease spreading substances. If you come in contact with floodwaters, wash your hands with soap and disinfected water.
- Avoid walking through floodwaters, as little as six inches of moving water can knock you off your feet.
- Do not drive through a flooded area. If you come upon a flooded road, turn around and go another way. A car can be carried away by just 2 feet of flood water.
- Electric current passes easily through water, so stay away from downed power lines and electrical wires.
- Look out for animals especially snakes.



## Marin City Community Development Corporation

### SAFETY TRAINING MANUAL

#### VI. BOMB THREAT RESPONSE PLAN

Bomb threats are usually received by phone, but it is possible that they are contained in packages or other objects. Bomb threats are used to warn people to evacuate an area where an explosive device may be placed. They are also used to cause alarm, panic and get attention.

##### **If a bomb threat is received:**

- Stay calm and keep your voice calm.
- If you are told by emergency responders to evacuate the building, notify the Warden and staff and evacuate at once.
- Do not close doors when evacuating.

##### **If you notice suspicious objects or packages in or near the office:**

- Do not open, shake or move the package or object.
- Immediately clear the area and notify staff.
- Do not approach or handle the object.
- Move a safe distance away and evacuate the building.
- Do not return to the building unless instructed to do so by the Warden or the Fire or Police Department.

#### VII. VIOLENCE RESPONSE PLAN

MCCDC is firmly committed to providing an environment free from acts of violence or threats of violence.

Watch for signals that may be associated with impending violence:

- Verbally expressed anger and frustration
- Verbalized vague or direct threats
- Body language such as threatening gestures
- Signs of drug or alcohol use
- Presence of a weapon

Maintain behavior that helps diffuse anger:

- Present a calm, caring attitude
- Give the person space
- Keep your voice lower than your normal level
- Don't hide your hands
- Don't match the threats
- Don't give orders



## Marin City Community Development Corporation

### SAFETY TRAINING MANUAL

Be alert:

- Watch for body language
- Don't isolate yourself with a potentially violent person.
- Always keep an open path for exiting

In the event of a verbal or physical attack, or serious threat of attack directed toward a staff person or guest, the following procedure shall be followed:

- Call 9-1-1 and immediately and then inform supervisor or an available staff
- Provide 9-1-1 dispatcher with the following information:
  - Location of event
  - Description of event
  - Approximate number of people involved/endangered



## Marin City Community Development Corporation

### WHISTLEBLOWER POLICY

This Whistleblower Policy has been adopted by Marin City Community Development Corporation (MCCDC), a Marin City not-for-profit corporation.

#### **1. RATIONALE**

MCCDC requires officers, directors and employees and consumers to observe the highest standards of business practices and personal ethics in the conduct of their duties and responsibilities. As officers, directors, and of MCCDC, we must practice honesty and personal integrity in fulfilling our responsibilities and comply with the letter and spirit of all applicable governmental laws and regulations as well as all internal policies. MCCDC activities must continuously be conducted in a manner that merits the trust and confidence of our supporters, members, donors and clients and reflects the important cause we serve.

#### **2. COMPLIANCE AND REPORTING RESPONSIBILITY**

It is the responsibility of all officers, directors, employees and to comply with MCCDC' highest standards and to report violations or suspected violations in accordance with this Whistleblower Policy.

#### **3. RETALIATION**

No officer, director or employee who in good faith reports a violation of MCCDC' standards of business practices and/or personal ethics shall suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a violation in good faith is subject to disciplinary action up to and including termination of employment. This Whistleblower Policy is intended to encourage and enable employees, consumers and others to raise serious concerns within MCCDC prior to seeking resolution outside of MCCDC.

#### **4. REPORTING VIOLATIONS**

MCCDC's standard procedures include its open door policy, which encourages that individuals share their questions, concerns, suggestions or complaints with someone who can address them properly. In most cases, an individual's supervisor is in the best position to address an area of concern. However, if an individual is not comfortable in speaking with his/her supervisor or is not satisfied with the supervisor's response, the individual is encouraged to speak with the Operations Manager or anyone else in management whom the individual is comfortable in approaching. Supervisors and other managers are required to report suspected violations of our standards of business practices or personal ethics to MCCDC's Board of Directors Chair (the "Board Chair") and Human Resources Committee Chair (the Executive Director), who have the responsibility to investigate all reported violations.

For suspected fraud, or when an individual is not satisfied or comfortable with reporting a suspected violation to a supervisor or other manager, the individual should:



## Marin City Community Development Corporation

### WHISTLEBLOWER POLICY

1. Contact the Board President and Executive Director directly, or
2. Contact our outside whistleblower reporting service, Paychex, Inc., by either:
  - a. making an anonymous telephone call to 1-800-472-0072, OR
  - b. sending an anonymous email message to (click File a Report).

Paychex, Inc. is a confidential reporting company that combines the best of technology via a toll-free international hotline and the internet, which protects the anonymity as to MCCDC of the individual reporting to Paychex, Inc.

The Board Chair and Executive Director are responsible for investigating and resolving all reported complaints and allegations concerning violations and, at their discretion, shall advise the Board of Directors. The Executive Director is required to report to the Board of Directors at least annually on whistleblower compliance activity.

#### **5. ACCOUNTING AND AUDITING MATTERS**

The Budget and Finance Committee of the Board of Directors shall address all reported concerns or complaints regarding corporate accounting practices, internal controls or auditing or related financial matters. The Board Chair and Executive Director shall immediately notify that Committee of any such complaint and work with that Committee until the matter is resolved.

#### **6. ACTING IN GOOD FAITH**

Anyone filing a complaint concerning a violation or suspected violation must act in good faith and have reasonable grounds for believing that information disclosed indicates a violation of MCCDC' high standards of business practices and personal ethics. The filing of any allegations that prove not to be substantiated, and which also prove to have been made maliciously or with knowledge of their falsity or otherwise recklessly or not in good faith, will be viewed as a serious disciplinary offense, and for employees may be grounds for termination or other disciplinary action.

#### **7. CONFIDENTIALITY**

Violations or suspected violations may be submitted by the complaining individual on a confidential basis, or may be submitted anonymously, under any of the procedures described above. Reports of violations or suspected violations will be kept confidential to the greatest extent possible, consistent with the need to conduct an adequate investigation and to make and act upon any determination under paragraph 6 above.