

SYSTEM POLICY

HR-38 - Workplace Harassment

Owner: ADMINISTRATIVE SERVICES

Key Points

- This policy applies to all The MetroHealth System (MHS) Workforce Members.¹
- This policy educates Workforce Members in the recognition and prevention of workplace harassment and provides procedures for addressing concerns.

Policy

1. MHS commits to maintain a work and patient care environment that is free of harassment or inappropriate conduct based on race, color, religion, gender, sexual orientation, gender identity or expression, citizenship, national origin, ancestry, disability, age, genetic information, pregnancy, veteran/military status, or other characteristic protected by law or MHS policy.
2. This policy prohibits conduct based on a protected characteristic that may create an intimidating or hostile environment, that may interfere with a Workforce Member's work, or that may impact employment opportunities.
3. MHS strictly prohibits any such conduct, whether it is by or toward a Workforce Member, visitor, applicant, or patient. This is the case regardless of whether the behavior also violates applicable law.
4. MHS expects Workforce Members to use good judgment; including expressing ideas and opinions in a respectful manner and not engaging in conduct that reasonably can be perceived as discriminatory, intimidating, degrading or bullying based on a protected characteristic. This includes conduct:
 - 4.1. During the workday and, depending on the circumstances, off-duty hours.
 - 4.2. In email, text or other electronic messages, conduct on the internet or social media, and off-duty conduct that may impact the workplace.
 - 4.3. Toward someone of the same sex or gender, or someone who otherwise shares the same protected characteristic(s).
5. Conduct prohibited by this policy includes, but is not limited to the following:
 - 5.1. Offensive and unwelcome verbal conduct such as lewd language, sexual descriptions, suggestions, or comments.
 - 5.2. Sexual, racial, ethnic jokes, or slurs.
 - 5.3. Jokes about an individual's appearance or identity.
 - 5.4. Use of offensive stereotypes.
 - 5.5. Offensive and unwelcome physical conduct such as kissing, touching, brushing up, blocking an individual's movement, leering, or sexual gestures.
 - 5.6. Sexual advances, propositions, or requests for sexual activity.
 - 5.7. Using sexual activity as a basis for employment decisions.
 - 5.8. Offensive and unwelcome written conduct such as obscene letters or notes, sexually suggestive photographs, drawings, or cartoons.
 - 5.9. Punishment or threats for not complying with sexual requests.

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- 5.10. Punishment or threats for addressing or reporting concerns under this policy.
- 5.11. Creating an intimidating, hostile, or offensive employment environment. Determination of whether an environment is “hostile” is based on the totality of the circumstances, including, but not limited to:
 - 5.11.1. The type, frequency, and duration of the conduct;
 - 5.11.2. The relationship between the complainant and respondent;
 - 5.11.3. The number of individuals involved;
 - 5.11.4. The location of the incident(s) and the context in which it occurred;
 - 5.11.5. The nature and severity of the conduct;
 - 5.11.6. A single incident may create a hostile environment if the incident is sufficiently severe.
- 6. Reporting: Workforce Members are not required to report to the person who is engaging in inappropriate behavior. These other avenues of reporting can also be used if a Workforce Member has raised concerns but does not believe that they have been resolved.
 - 6.1. Workforce Members have multiple options for reporting conduct prohibited by this policy:
 - 6.1.1. To supervisor: Any Workforce Member who experiences, observes or learns about such behavior, or who has any questions should discuss the situation as soon as possible with their supervisor. Some situations can be resolved in an informal manner, and the supervisor can help.
 - 6.1.2. To the offending individual: Workforce Members, if comfortable doing so, are encouraged to first tell the offending individual that their conduct is unwelcome and to stop. However, such informal measures are not required.
 - 6.1.3. To other levels of management or Human Resources (HR): If a Workforce Member with concerns is not comfortable reporting the concerns to their supervisor, they can report to the next level of management or to HR.
 - 6.1.4. Anonymous reporting: If a Workforce Member with concerns is not comfortable reporting the concerns to their supervisor or they would like to report their concerns anonymously, they can report to the MetroHealth Ethics Line (MEL) at (216) 778-1660 or at www.metrohealth.org/compliance.
- 7. MHS does not tolerate prohibited conduct or inappropriate behavior by patients or visitors towards Workforce Members. Workforce Members who experience prohibited behavior in connection with their work by a patient or visitor should report the incident immediately.
- 8. MHS promptly investigates and takes appropriate action to remedy these types of situations. MHS takes violations of this policy seriously. Based on the circumstances and severity, violations may subject a Workforce Member to disciplinary action, up to and including termination of employment. To address situations, however, they need to be brought to the attention of management as soon as possible. To support this process, Workforce Members should fully cooperate and provide truthful information during investigations.
- 9. Every reasonable attempt is made by MHS to maintain confidentiality during and after an investigation. MHS generally shares information only as necessary to investigate and only with those who have a need to know. MHS may need to report certain situations outside of the MHS, such as to law enforcement or other authorities.

10. MHS fosters an environment where Workforce Members feel comfortable sharing concerns and asking questions without worrying about retaliation. MHS prohibits retaliation or punishment against Workforce Members who report suspected wrongdoing or participate in an investigation in good faith. MHS investigates all reports of retaliation against Workforce Members. See [HR-80 - Non-Retaliation](#) .

End Notes

- ¹ Workforce Member: Employees, providers, volunteers, trainees, and other persons whose conduct, in the performance of work for MHS, is under the direct control of such entity, whether or not they are paid by MHS.

Dates

Initiated June 1991

Reviewed/Revised: March 1997, May 1999, March 2001, December 2004, April 2008, October 2018, January 2020, April 2021, May 2025

Approved

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MHS Policy Committee