



Center City Housing Corp. Equal Access Policy & Practice

Center City Housing Corp. (CCHC) is committed to the continuing development and implementation of policies, practices, and procedures that embrace a diverse, equitable and inclusive environment. CCHC is committed to being welcoming to all individuals. We believe there is strength in learning from each other and recognizing that our similarities and differences help form a strong organization and enrich the community in which we live. We recognize that diversity includes, but is not limited to race, ethnicity, nationality, religion, socioeconomic status, education, marital status, language, age, sex, sexual orientation, gender identity, gender expression, mental or physical ability, and learning styles.

CCHC is an affirmative action and equal opportunity employer and provider of housing. CCHC will not discriminate with respect to hiring, promotion, termination, compensation or any other term or condition of employment, nor in respect to tenant selection, placement, eviction, or any other condition of housing on the basis of race, color, creed, religion, national origin, sex, marital status, familial status, disability, age, sexual orientation, gender identity, gender expression, to include non-binary, transgender, and gender non-conforming, status regarding public assistance, human rights commission activity or any other basis deemed illegal. This policy further prohibits retaliation against anyone who, in good faith, has complained of or reported discrimination, even if insufficient evidence is found to support the complaint. Any claimed violation of this policy must be reported promptly to Human Resources (in the case of employees), the Property Manager (in the case of tenants), or the Executive Director.

The following policy represents how CCHC strives to be equitable and inclusive.

- **Employment practices**
 - Recruitment, hiring and onboarding that removes common barriers
 - Buildings that have gender neutral restrooms
 - We are an Equal Employment Opportunity/Affirmative Action employer
 - Harassment free workplace is reinforced with training of all employees at onboarding and annually.
 - CCHC's Equal Access Policy is provided to employees at orientation, tenants are educated on their rights and receive CCHC's policy upon move in and ongoing as needed. Information is available to vendors.
 - Hire a diverse workforce that is representative of those we serve
 - Openly promote environmental and emotional safety for all

- **Board and Administration**
 - Strive to recruit a Board of Directors that reflects the diverse workforce and people we serve

- **Confidentiality**
 - CCHC employees, volunteers, and contractors have an ethical and legal obligation to respect the privacy of our clients, and to protect and maintain the confidentiality of all information that we learn about our clients, their family members and friends in the course of providing services to them. Client and employee records are legally protected confidential records and must be treated as such. This means that client and employee records maintained by CCHC must be kept in locked file cabinets at all times except when they are being reviewed or supplemented by an authorized employee. Client/employee records should never leave the office, except as permitted by CCHC's Confidentiality Policy. Client and employee records and related business (including any protected personal information such as the names, gender, etc.) should not be discussed with or disclosed to anyone except: coworkers who are specifically authorized under CCHC's Confidentiality Policy to have access to such information; your supervisor; the Executive Director; any person authorized by the client to obtain information about the client from you (any such authorization must be in writing in a form approved by the Executive Director and must be retained in the client's or employee's file); or any person with whom the Executive Director has authorized you to share the information. As tempting as it may be at times, it is illegal, unethical and a violation of our Confidentiality Policy for you to

discuss client or employee matters with your friends, spouse, relatives, or anyone else, except those persons listed above, unless required by court order or otherwise required to do so by law. If someone insists on obtaining information from you about a client or employee, and the client or employee has not authorized the disclosure, refer the matter to the Executive Director. Violations of CCHC's Confidentiality Policy are considered very serious, and may result in disciplinary action, up to and including dismissal.

- Employees, volunteers, and partners must keep tenant gender identity confidential including gender assigned at birth. The tenant may sign a release to disclose information as needed and by choice. Information is only shared with relevant employees on a need-to-know basis.
- Potential tenants and tenants are explained the implications of releasing information. CCHC employees provide information on Data Privacy, Confidentiality, Equal Access, Homeless Management Information System (HMIS), and Discrimination/Harassment at Intake and move in. Posters and handouts are provided, at the site, which include Rights and Contact Information if violations may have occurred.

- **Housing and Tenants**

- CCHC utilizes the Coordinated Entry referral systems which prioritizes those individuals with the greatest need of housing services. CCHC serves all individuals who are eligible for housing. Eligibility is not determined based on gender nor will a potential tenant or tenant become ineligible based on appearance, gender nonconforming, or stereotypes. Every gender identity is supported by CCHC.
- Every CCHC property provides one entry lobby for all genders that includes access to an individual all gender bathroom.
- CCHC Intake forms collect legal name and preferred name as well as gender. The potential tenant's or current tenant's gender identity is not required to match the gender indicated on the tenant's legal identification document. The information collected is used for specific documents that are usually required by funding streams that support the service provision. Information is collected in a safe private setting. Tenants or potential tenants may request an alternative setting.

- The CCHC service provision includes assisting tenants with accessing all necessary resources including advocacy, obtaining entitlement benefits, inclusive identification documents and healthcare as needed.
- **Harassment**
 - CCHC strives to establish and maintain supports that provide for facilities and systems that are free from discrimination or harassment in any form (this includes gender identity, sexual orientation, gender expression and use of pronouns).
 - Harassment is addressed in the employee manual that is provided to employees on hire. The Tenant Handbook addresses tenant conduct and is provided to tenants at move in. This CCHC Equal Access Policy specifically includes harassment of LGBTQ individuals. This form of harassment includes tenant, staff, volunteer, and vendor refusal to use the tenant's preferred name or pronoun, disclosure of tenant's gender nonconforming or transgender status, maliciously questioning an individual's anatomy or appearance, and acts of physical intimidation. All staff, volunteers, tenants, and vendors are expected to respect and use an individual's preferred pronoun, name, and gender as well as understand that an individual's appearance may not reflect an individual's identity.
 - CCHC's policy is to provide a work environment that is free from harassment. Therefore CCHC will not tolerate harassment based on age, race, gender, color, religion, national origin, disability, marital status, covered veteran status, sexual orientation, gender identity, gender expression, status with respect to public assistance, and other characteristics protected under state, federal, or local law. Such conduct is prohibited in any form at the workplace, at work-related functions, or outside of work if it affects the workplace. This policy applies to all CCHC employees, tenants, customers, guests, vendors, and persons doing business with CCHC.
 - Any reported incident of harassment will be investigated immediately and thoroughly. Complaints and actions taken to resolve complaints will be handled as confidentially as possible, given CCHC's obligation to investigate and act upon reports of such harassment. Appropriate actions will be taken by CCHC to stop and remedy any and all such conduct, including interim measures during a period of investigation.

- Retaliation of any kind or discriminating against an employee who reports a suspected incident of harassment or who cooperates in an investigation is prohibited. An employee who violates this policy or retaliates against another employee in any way will be subject to disciplinary action up to and including immediate termination.
- A Tenant Handbook addressing tenant personal & discriminatory conduct is explained and provided to all tenants at move in. Tenant Communication forms are available 24 hours a day and are located at the Front Desk. Tenant communication forms are used by the tenant to file a concern. Tenants may also contact Property Management or the Service staff to discuss and file a concern.
- CCHC resolves conflicts between and with tenants, promptly, in a setting that accommodates the tenant's safety and privacy needs. Staff assist the tenant to identify and obtain safe accommodating space as needed by the tenant.
- CCHC staff assist tenants to resolve tenant conflicts promptly in an unbiased manner that promotes equality, fairness and respect.
- In the event a tenant requests accommodations due to harassment, discrimination or a safety concern, all effort is made to accommodate the request. If there is a need for a tenant to move to a different unit, the tenant with the bias can be the tenant to receive the alternative unit. All efforts are made to intervene in a timely manner respecting the tenant's personal safety concerns and requests.

- **Additional Practices**

- The DEI committee regularly reviews/revises ongoing policies and procedures with input from its tenants, staff, and partners at its locations throughout the state.
- CCHC recognizes the need to intervene and educate individuals who assume their personal safety is at risk just because another individual is gender nonconforming or transgender.
- CCHC strives to use inclusive language in all aspects of training, communications (written & verbal), and documents.
- CCHC strives to comply with the standards of HUD's Equal Access Rule as well as State and local standards. CCHC will continue to improve and implement policy on a continuing basis thus, the policy is subject to revision at any time.