

# Shadowfax

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Title	Civil Rights and Complaints Policy
Policy Number	ORG.1003.000.000
Initiating Authority	Policy Committee
Approved By	Compliance Committee
Origin Date	June 21, 2021
Revision Date	
Effective Date	July 1, 2021
Next Review Date	June 2022
Associated Policies	ORG.1015.000.000 Reporting Concerns and No Retaliation
Associated Procedures	
Associated Documents	

## I. POLICY STATEMENT

Shadowfax is committed to fair and equal treatment for all our staff and the individuals we serve.

## II. PURPOSE

This policy provides Shadowfax's standards on Civil Rights related to employment and/or services we deliver, and methods for raising complaints and concerns.

## III. SCOPE

This policy applies to applicants, volunteers, staff, potential and existing clients, ("individuals") and applies to services that are delivered in the home, in Shadowfax facilities or in the community. This policy applies to third parties acting on behalf of Shadowfax or delivering services to Shadowfax, i.e., consultants, suppliers, etc.

## IV. GENERAL

This policy is based on the standards set by Title VII of the Civil Rights Act of 1964, the Pennsylvania Human Relations Act, Section 503 of the Rehabilitation Act of

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1973, the Vietnam Era Veterans Readjustment Assistance Act of 1974, Executive Order 11246, the Americans With Disabilities Act of 1990, and the Age Discrimination in Employment Act (ADEA).

## V. **POLICY**

### Anti-Discrimination

Shadowfax will not discriminate on the grounds of race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, non-English speaking and non-verbal individuals, or any other characteristic protected by federal, state, or local laws in decisions related to:

- A. employment as a qualified applicant
- B. delivery of benefits as a staff member
- C. delivery of services or other benefits as an individual or potential individual, including admissions, placement, facility usage, referrals and communication with individuals who are non-verbal and non-English speaking.

Shadowfax will provide language assistance to individuals with limited proficiency in English without charge to that person.

### Equal Opportunity Employment

Shadowfax provides equal employment opportunities (EEO) to all staff and applicants without regard to race, color, religion, age, sex, national origin, disability status, genetics, protected veteran status, sexual orientation, gender identity or expression, or any other characteristic protected by federal, state or local laws.

This policy applies to all terms and conditions of employment, including, but not limited to, hiring, probation, placement, promotion, transfer, termination, retirement, layoff, recall, and leaves of absence, compensation, social and recreation programs, staff member development, and training as a service deliverer.

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Shadowfax, if required by law, will establish a written affirmative action program to achieve prompt and full utilization of minorities, individuals with disabilities, disabled veterans, Vietnam-era veterans, and women at all levels and in all segments of the work force.

The Director of Human Resources is responsible for formulating, implementing, coordinating, and monitoring all efforts related to EEO. The Director of Human Resources' duties related to EEO shall include, but not be limited to:

- A. assisting management in collecting and analyzing employment data
- B. developing policy statements, affirmative action programs, if required, and recruitment techniques designed to comply with Shadowfax's EEO policies
- C. complying with various record keeping and posting notices required by statute to ensure full compliance with all employment-related statutes and regulations
- D. assisting supervisory personnel in arriving at solutions to specific personnel problems
- E. serving as liaison between the Shadowfax and government agencies, minority and women's organizations, and other community groups
- F. keeping management informed of the latest developments in EEO

Concerns related to EEO matters from an applicant for employment, a staff member, a government agency, or an attorney will be referred to the Director of Human Resources.

## Accessibility

Program services shall be made accessible to eligible individuals with physical disabilities through the most practical and economically feasible methods available. These methods include, but are not limited to, equipment redesign, the provision of aids, and the use of alternative service delivery locations. Structural modifications shall be considered only as last resort among available methods.

## Notification/Communication

New staff members, individuals, and individuals' parents, guardians, advocates, or designated persons will be provided a copy of Shadowfax's Civil Rights policy. Each

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Shadowfax department and/or program area shall create and maintain a procedure for providing the appropriate people with a copy of the Civil Rights policy.

## Complaints

Anyone who believes they have experienced or witnessed conduct at Shadowfax not in line with this policy should discuss their concerns with their immediate supervisor, Human Resources or any member of senior leadership (see ORG.1015.000.000 Reporting Concerns and No Retaliation Policy)

The Affirmative Action Officer for the Shadowfax Corporation is the Director of Human Resources.

Complaints of discrimination may be filed with the Affirmative Action Officer of the agency or at any of the following addresses:

The Shadowfax Corporation  
386 Pattison Street  
York, PA 17403

PA Human Relations Commission  
Harrisburg Regional Office  
333 Market Street 8th Floor  
Harrisburg, PA 17101

Department of Public Welfare  
Bureau of Equal Opportunity, Central Regional Office  
625 Forster Street  
Room 225, Health & Welfare Building  
Harrisburg, PA 17105

Office of Civil Rights  
U.S. Department of Health & Human Services  
Suite 372, Public Ledger Bldg  
150 S. Independence Mall West

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Philadelphia, PA 19106-9111

## VI. OVERSIGHT

Shadowfax’s Compliance Committee or their designee(s) (the "Approved By") shall be in charge of the administration of this Policy. The Approved By responsibilities include:

- 1. Identifying the action steps to come into compliance and directives to maintain compliance and implement the action steps.
- 2. Periodically reviewing this Policy and monitoring compliance to it.
- 3. Training responsible parties on their obligations under the Policy.

### Revision History

Name	Date	Reason for Changes	Version

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