



COMMONWEALTH OF MASSACHUSETTS
COMMISSION AGAINST DISCRIMINATION

MODEL SEXUAL HARASSMENT
POLICY

Under the provisions of G.L. c.151B, ss.2 and 3 the Commission is authorized to adopt policies and issue such rules necessary to effectuate the purposes of G.L. c.151B. It is the goal of the Commission that such policies and rules assist members of the public in understanding the role, function, and process of the MCAD.

As a result of the enactment of St. 1996, c.278 “An Act Relative to Sexual Harassment and Training in the Workplace” the Commission is required to adopt a model sexual harassment policy. This Policy Guideline is promulgated to effectuate the purposes of that chapter and provides a model for employers to use. The model policy contains minimum standards which may be exceeded by the employer’s policy.

MCAD Policy 96-2

ADOPTED BY THE COMMISSION ON OCTOBER 25, 1996

Adopted by the Board of Directors on December 17, 1996
Amended by the Board of Directors on September 28, 2004
Amended by the Board of Directors on March 28, 2006
Amended by the Board of Directors on March 11, 2009
Amended by the Board of Directors on October 10, 2018
Amended by the Board of Directors on May 15, 2019
Amended by the Board of Directors on November 13, 2024
Amended by the Board of Directors on October 8, 2025

Attachment #1

SEXUAL HARASSMENT POLICY OF THE SALEM HOUSING AUTHORITY

I. Introduction

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

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

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

II. Definition of Sexual Harassment

In Massachusetts, the legal definition for sexual harassment is this:

“sexual harassment” means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

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

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

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

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

- Unwelcome sexual advances – whether they involve physical touching or not;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life; comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- Displaying sexually suggestive objects, pictures, cartoons;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- Inquiries into one's sexual experiences; and,
- Discussion of one's sexual activities.

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

III. Complaints of Sexual Harassment

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

If you would like to file a complaint you may do so by contacting Cathy Sheehan, Executive Director, 27 Charter Street, Salem, MA 01970, telephone number 978-744-4431, extension 111. If the matter is not resolved to the employee's satisfaction, he/she should contact Emily Ullman, duly appointed Sexual Harassment Policy Officer, 4 Buffum Street, Salem, MA 01970, telephone number 978-594-7059. If the matter remains unresolved, the Sexual Harassment Policy Officer will recommend bringing the matter to the attention of the Salem Housing Authority Board in Executive Session. These persons are also available to discuss any concerns you may have and to provide information to you about our policy on sexual harassment and our complaint process.

IV. Sexual Harassment Investigation

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

harassment. When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation.

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

V. Disciplinary Action

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

VI. State and Federal Remedies

In addition to the above, if you believe you have been subjected to sexual harassment, you may file a formal complaint with either or both of the governing agencies set forth below. Using our complaint process does not prohibit you from filing a complaint with these agencies. Each of the agencies has a short time period for filing a claim (EEOC – 180 days; MCAD – 6 months).

1. The United States Equal Employment Opportunity

Commission (“EEOC”)

2400 Government Center

John F. Kennedy Federal Building

Boston, MA 02203

(617) 565-3200

2. The Massachusetts Commission Against Discrimination (“MCAD”)

Boston Office:

One Ashburton Place – Rm 601

Boston, MA 02108

(617) 727-3990

Springfield Office:

436 Dwight Street

Springfield, MA 01103

(413) 739-2145

A copy of this Policy was received by _____

on the _____ day of _____, 20____.

Signature of Employee



Cathy Sheehan, Executive Director

Main Office and Public Housing Department
27 Charter Street, Salem, MA 01970

Section 8 Department & Procurement/Modernization
136 Canal Street, Suite 2, Salem, MA 01970

Telephone: 978-744-4431 Fax: 978-744-9614
Website: www.salemha.org

EXTRACT FROM THE MINUTES OF THE\\
REGULAR BOARD OF DIRECTORS MEETING
WEDNESDAY, OCTOBER 8, 2025
6:00 p.m.

The BOARD MEMBERS of the SALEM HOUSING AUTHORITY met in a REGULAR BOARD OF DIRECTORS MEETING WEDNESDAY, OCTOBER 8, 2025 at Salem Housing Authority, VIA ZOOM WEBINAR, at 6:00 p.m. the place, hour, and date duly established for the holding of such meeting.

This meeting was held via Zoom Webinar.

The meeting was called to order at 6:02 p.m. by Emily Ullman, Acting Chair and upon a roll call, the following answered present:

Present

Romell Kidd
Doneeca Thurston-Chavez
Emily Ullman
Veronica Miranda

Absent

Aaron Paternoster

Also Present: Cathy Hoog, Executive Director, Gary Dean, Director of Maintenance, Debra Tucker, Assistant Executive Director, Anne Cameron, Executive Assistant, Jacqueline Guzman, Director of Leased Housing, Maureen Thomas, Director of Public Housing, Massiel Garcia, Finance Director and Joshua Bocko, Assistant Director of Public Housing

The Chair declared a quorum present.

MOTION

The following resolution was introduced by Emily Ullman, Acting Chair, read in full, and considered:

Romell Kidd moved to appoint Emily Ullman as the new Sexual Harassment Officer. Said Sexual Harassment Policy shall be revised to reflect this Board Vote. Veronica Miranda seconded the motion and the roll call vote was as follows:

Ayes

Romell Kidd
Doneeca Thurston-Chavez
Emily Ullman
Veronica Miranda

Nays

The Acting Chair thereupon declared the motion carried.



Equal Opportunity Employer

