



Administrative Regulation  
No. HR.02  
Effective date: 6/16/21

**SUBJECT: ANTI-HARASSMENT POLICY**

**PURPOSE:** To define and issue to all employees the City's policy on the prohibition of workplace harassment.

I. **POLICY:** The City is committed to maintaining a work environment that is pleasant, professional, and free from intimidation, hostility, or other offensive conduct that might interfere with work performance. Harassment of any sort -- verbal, physical, or visual -- will not be tolerated. This includes sexual harassment as well as harassment based on an employee's status in a protected class. These classes include age, sex or gender (including pregnancy, childbirth, breastfeeding or related medical conditions), genetic information or characteristics, gender identity, gender expression, race, color, ancestry, national origin, religious creed, marital status, military and veteran status, sexual orientation, physical or mental disability, medical condition, and any other status protected by federal or state law. This policy also prohibits unlawful harassment based on the perception that someone has any protected characteristics, or is associated with a person who has or is perceived to have any protected characteristics.

II. **RESPONSIBILITIES:**

1. **Lead Department:** Human Resources and City Attorney's Office
2. **Supporting Department(s):** All

The Human Resources Department shall ensure that all employees are issued a copy of this policy and receive the appropriate training at the intervals specified by law, or more frequently at the discretion of the City.

City staff involved in contract administration, review, and approval shall ensure that new and existing contracts adhere to the City's Anti-Harassment Policy contract provisions, including but not limited to attaching a copy of this AR as an exhibit to the contract, citing violations of the City's anti-harassment policy as grounds for termination of contract, and requiring signed acknowledgements of receipt of this AR from contract staff.

All employees that have knowledge of actual or potential harassment (as defined in this AR) shall report it immediately to the Human Resources Department and/or a supervisor.

Department Heads are responsible for educating and informing the individuals within their department about the City's Administrative Regulations.

III. **DEFINITIONS:**

For purposes of this policy, employees should note that the City generally uses the definitions of protected characteristics set forth in Government Code section 12926,<sup>1</sup> which is incorporated herein by reference and attached hereto as Exhibit A.

1. Age: The chronological age of any individual who has reached a 40th birthday.
2. National origin: This includes, but is not limited to, discrimination on the basis of possessing a driver's license granted under Section 12801.9 of the Vehicle Code.
3. Religious creed: This includes all aspects of religious belief, observance, and practice, including religious dress and grooming practices. "Religious dress practice" shall be broadly construed to include the wearing or carrying of religious clothing, head or face coverings, jewelry, artifacts, and any other item that is part of an individual observing a religious creed. "Religious grooming practice" shall be construed broadly to include all forms of head, facial, and body hair that are part of an individual observing a religious creed.
4. Gender expression: A person's gender-related appearance and behavior, whether or not stereotypically associated with the person's assigned sex at birth.
5. Race: This is inclusive of traits historically associated with race, including but not limited to, hair texture and protective hairstyles. "Protective hairstyles" includes, but is not limited to, hairstyles such as braids, locks, and twists.

Other definitions include the following:

6. Workplace harassment: This can take many forms. It may be, but is not limited to, offensive or harassing words, pictures, jokes, pranks, intimidation, electronic communications (including social media), physical assaults or contact, or violence. Harassment includes derogatory statements not directed to the targeted individual but taking place within their earshot. Other prohibited conduct includes the dissemination or display of written material such as notes, photographs, cartoons, or articles of an offensive or harassing nature.
7. Sexual harassment: This includes unwelcome sexual advances, requests for sexual favors, or other unwanted verbal or physical contact of a sexual nature. The law defines two categories of sexual harassment. The first category is "quid pro quo" and the second category is "hostile work environment."

Sexual harassment crosses age and gender boundaries and can occur between any two or more employees, regardless of their status. Among other perceived unconventional situations, sexual harassment may involve two women or two men. Harassment exists on a continuum, and need not involve overt sexual advances or physical conduct to constitute prohibited behavior. For instance, harassment may occur when an employee shows sexually suggestive pictures to another employee. A picture will be presumed to be sexually suggestive if it depicts a person who is not fully clothed or in clothes that are not suited to the

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<sup>1</sup> If other applicable statutes would result in the broader protection of civil rights, then the City may, if required by law, refer to such other statutes to define the protected categories.

workplace, or if the person is in a sexual position or performing a sexual act. Sexual harassment need not be motivated by sexual desire.

The law prohibits any form of sexual harassment that impairs an employee's working ability or emotional well-being at work. Even if the conduct does not rise to the level prohibited by law, the City will not tolerate it.

8. "Quid pro quo" sexual harassment: Under the law, this is the first category of sexual harassment. This type of harassment occurs when one employee offers or hints that said employee will give another employee some kind of benefit or improvement in working conditions (e.g., a raise or promotion, guarantee of continued employment, better office space or work assignments, etc.) in exchange for that employee's satisfaction of a sexual demand or submission to sexually harassing conduct, or that rejection of sexual advances will lead to the denial of a workplace benefit.
9. "Hostile work environment" sexual harassment: Under the law, this is the second category of sexual harassment. This type of harassment occurs when unwelcome sexual advances, requests for sexual favors, or verbal or other conduct creates an intimidating or offensive working environment.

#### **IV. SCOPE AND APPLICABILITY:**

This policy covers all individuals in the workplace, including full-time and part-time employees, independent contractors, volunteers, interns, elected officials and anyone else performing work for the City (for ease and purposes of this AR only, referred to collectively herein as "employees"). The workplace is not limited to City property, but includes anywhere City business is conducted or where any business-related function (including social events) takes place.

#### **V. EXCEPTIONS:** There are no exceptions to this policy.

#### **VI. RESPONSIBILITIES AND PROCEDURES:**

##### **A. Training:**

All employees in supervisory roles and all elected officials will be required to attend two hours of harassment prevention training every two years, or more frequently at the discretion of the City. Effective January 1, 2021, all employees in non-supervisory roles will be required to attend one hour of harassment training every two years, or more frequently at the discretion of the City.

##### **B. Reporting Harassment:**

1. *All City Employees*: Have a responsibility for keeping the work environment free of harassment. Any employee who becomes aware of an incident of harassment, whether by witnessing the incident or being told of it, must report it to their supervisor even if they are asked not to by the person who experienced the harassment, or by anyone else. Employees are never required to report an incident of harassment to the individual they believe is responsible for the

harassment, and may make a report to another supervisor or a manager in Human Resources if they do not feel comfortable reporting to their immediate supervisor.

Those who believe they have been harassed in the course of work for the City, may confront the harasser and ask them to stop, and the City will not permit any retaliation against the employee for doing so. While the City encourages employees to communicate directly with the harasser and make it clear that the harasser's behavior is unacceptable, employees are not required to do so. It is essential, however, to report the conduct immediately.

2. *Supervisors:* Have a responsibility for keeping the work environment free of harassment. Any supervisor who becomes aware of an incident of harassment or who receives a harassment complaint, must report it to their supervisor and the Director of Human Resources (or designee). Supervisors must report an incident even if they are asked not to by the person who experienced the harassment, or by anyone else. Supervisors need to remember that employees are never required to report an incident of harassment to the individual they believe is responsible for the harassment and may make a report to another supervisor, manager, or Human Resources if they do not feel comfortable reporting to their immediate supervisor.

C. Notice of Possible Harassment or Harassment Allegations:

1. *Supervisor:* A supervisor or manager who is aware of an incident of harassment or who receives a report of possible harassment must notify the Director of Human Resources (or designee) as soon as possible. If the Director of Human Resources (or designee) is alleged to be responsible, the report is to be made to City Manager.
2. *Management:* When management becomes aware of a harassment allegation, it is obligated by law to take prompt and appropriate action, whether or not the victim wants the City to do so.

D. City Harassment Investigations:

The Director of Human Resources (or designee) will be responsible for ensuring that a fair, timely, and thorough investigation is completed in response to any allegation of harassment, as defined by law or this policy. The Director of Human Resources (or designee) may delegate any portion of the investigation, including hiring an outside agency, but may not delegate the basic responsibility of ensuring that a proper investigation is completed. The nature of the investigation will vary based on the nature of the allegations and report received. Written reports with the details of the circumstances and identities of the parties involved present the best opportunity for investigation. Verbal and anonymous reports will be accepted, but may limit the investigation that can be accomplished.

All reported incidents of prohibited harassment will be investigated in a prompt, effective, thorough, and objective manner that provides all parties with appropriate due process and reaches reasonable conclusions based on the evidence collected. The investigation will be completed and a determination regarding the reported harassment will be communicated to both the complainant and the accused harasser.

E. Confidentiality:

All reports of harassment will be investigated with due regard for the privacy of everyone involved. Confidentiality will be maintained to the extent possible. However, absolute confidentiality cannot be guaranteed because disclosure of some information may be required as part of the investigation, consistent with due process requirements or as required by law. Any employee found to have engaged in harassment will be subject to appropriate disciplinary action up to and including termination. The City will also take any additional action necessary to appropriately remedy the situation. Retaliation will not be permitted. No adverse employment action will be taken against any employee making a good faith report of alleged harassment, no matter the result of the investigation.

F. Retaliation Prohibited:

The City prohibits any employee from retaliating in any way against anyone who has made a good faith harassment complaint, raised any concern about harassment, or participated in a harassment investigation. Retaliation is not limited to adverse employment actions, but may also include chastisement, derogatory or insulting remarks, social ostracism or any other conduct intended to punish the employee or deter employees from reporting harassment or cooperating in investigations. The City will investigate any complaint of retaliation and will take immediate and appropriate disciplinary action if retaliation has occurred. Complaints of retaliation should be reported and will be investigated according to the same procedure as harassment complaints.

G. Department of Fair Employment and Housing (DFEH):

In addition to the investigation conducted by the City, the California Department of Fair Employment and Housing (DFEH) investigates and may prosecute complaints of workplace harassment. Whenever employees think they have been harassed or retaliated against for complaining about harassment, those employees may file a complaint with the DFEH within one year from the date of the incident. The nearest DFEH office is located in downtown Los Angeles at 320 W. 4th Street and can be reached at 213-439-6799. Complaint forms can also be found online at [www.dfeh.ca.gov](http://www.dfeh.ca.gov).

## **VII. FORMS AND ATTACHMENTS:**

1. Exhibit A: Government Code 12926

## **VIII. UPDATE HISTORY:**

- 07/02/2002: First revision to this AR.
- In 2021, this AR was revised to reflect changes in state law and to reflect the new AR format, i.e., addition of sections dealing with responsibilities, scope and applicability, exceptions, procedures, forms and attachments, and update history. Other revisions included new definitions, the removal of gender specific references, and the renumbering of the AR, from AR 3B.10 to AR HR.02.

Approved:

*George Chavez*

June 16, 2021 | 13:54 PDT

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GEORGE CHAVEZ            DATE  
City Manager

*Shelley Ovrom*

May 26, 2021 | 11:16 PDT

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SHELLEY OVROM            DATE  
Director of Human Resources

*Laurence Wiener*

June 7, 2021 | 17:47 PDT

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LAURENCE WIENER        DATE  
City Attorney

**State of California****GOVERNMENT CODE****Section 12926**

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12926. As used in this part in connection with unlawful practices, unless a different meaning clearly appears from the context:

(a) “Affirmative relief” or “prospective relief” includes the authority to order reinstatement of an employee, awards of backpay, reimbursement of out-of-pocket expenses, hiring, transfers, reassignments, grants of tenure, promotions, cease and desist orders, posting of notices, training of personnel, testing, expunging of records, reporting of records, and any other similar relief that is intended to correct unlawful practices under this part.

(b) “Age” refers to the chronological age of any individual who has reached a 40th birthday.

(c) Except as provided by Section 12926.05, “employee” does not include any individual employed by that person’s parent, spouse, or child or any individual employed under a special license in a nonprofit sheltered workshop or rehabilitation facility.

(d) “Employer” includes any person regularly employing five or more persons, or any person acting as an agent of an employer, directly or indirectly, the state or any political or civil subdivision of the state, and cities, except as follows:

“Employer” does not include a religious association or corporation not organized for private profit.

(e) “Employment agency” includes any person undertaking for compensation to procure employees or opportunities to work.

(f) “Essential functions” means the fundamental job duties of the employment position the individual with a disability holds or desires. “Essential functions” does not include the marginal functions of the position.

(1) A job function may be considered essential for any of several reasons, including, but not limited to, any one or more of the following:

(A) The function may be essential because the reason the position exists is to perform that function.

(B) The function may be essential because of the limited number of employees available among whom the performance of that job function can be distributed.

(C) The function may be highly specialized, so that the incumbent in the position is hired based on expertise or the ability to perform a particular function.

(2) Evidence of whether a particular function is essential includes, but is not limited to, the following:

(A) The employer’s judgment as to which functions are essential.

(B) Written job descriptions prepared before advertising or interviewing applicants for the job.

(C) The amount of time spent on the job performing the function.

(D) The consequences of not requiring the incumbent to perform the function.

(E) The terms of a collective bargaining agreement.

(F) The work experiences of past incumbents in the job.

(G) The current work experience of incumbents in similar jobs.

(g) (1) "Genetic information" means, with respect to any individual, information about any of the following:

(A) The individual's genetic tests.

(B) The genetic tests of family members of the individual.

(C) The manifestation of a disease or disorder in family members of the individual.

(2) "Genetic information" includes any request for, or receipt of, genetic services, or participation in clinical research that includes genetic services, by an individual or any family member of the individual.

(3) "Genetic information" does not include information about the sex or age of any individual.

(h) "Labor organization" includes any organization that exists and is constituted for the purpose, in whole or in part, of collective bargaining or of dealing with employers concerning grievances, terms or conditions of employment, or of other mutual aid or protection.

(i) "Medical condition" means either of the following:

(1) Any health impairment related to or associated with a diagnosis of cancer or a record or history of cancer.

(2) Genetic characteristics. For purposes of this section, "genetic characteristics" means either of the following:

(A) Any scientifically or medically identifiable gene or chromosome, or combination or alteration thereof, that is known to be a cause of a disease or disorder in a person or that person's offspring, or that is determined to be associated with a statistically increased risk of development of a disease or disorder, and that is presently not associated with any symptoms of any disease or disorder.

(B) Inherited characteristics that may derive from the individual or family member, that are known to be a cause of a disease or disorder in a person or that person's offspring, or that are determined to be associated with a statistically increased risk of development of a disease or disorder, and that are presently not associated with any symptoms of any disease or disorder.

(j) "Mental disability" includes, but is not limited to, all of the following:

(1) Having any mental or psychological disorder or condition, such as intellectual disability, organic brain syndrome, emotional or mental illness, or specific learning disabilities, that limits a major life activity. For purposes of this section:

(A) "Limits" shall be determined without regard to mitigating measures, such as medications, assistive devices, or reasonable accommodations, unless the mitigating measure itself limits a major life activity.

(B) A mental or psychological disorder or condition limits a major life activity if it makes the achievement of the major life activity difficult.

(C) “Major life activities” shall be broadly construed and shall include physical, mental, and social activities and working.

(2) Any other mental or psychological disorder or condition not described in paragraph (1) that requires special education or related services.

(3) Having a record or history of a mental or psychological disorder or condition described in paragraph (1) or (2), which is known to the employer or other entity covered by this part.

(4) Being regarded or treated by the employer or other entity covered by this part as having, or having had, any mental condition that makes achievement of a major life activity difficult.

(5) Being regarded or treated by the employer or other entity covered by this part as having, or having had, a mental or psychological disorder or condition that has no present disabling effect, but that may become a mental disability as described in paragraph (1) or (2).

“Mental disability” does not include sexual behavior disorders, compulsive gambling, kleptomania, pyromania, or psychoactive substance use disorders resulting from the current unlawful use of controlled substances or other drugs.

(k) “Veteran or military status” means a member or veteran of the United States Armed Forces, United States Armed Forces Reserve, the United States National Guard, and the California National Guard.

(l) “On the bases enumerated in this part” means or refers to discrimination on the basis of one or more of the following: race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, age, sexual orientation, or veteran or military status.

(m) “Physical disability” includes, but is not limited to, all of the following:

(1) Having any physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss that does both of the following:

(A) Affects one or more of the following body systems: neurological, immunological, musculoskeletal, special sense organs, respiratory, including speech organs, cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine.

(B) Limits a major life activity. For purposes of this section:

(i) “Limits” shall be determined without regard to mitigating measures such as medications, assistive devices, prosthetics, or reasonable accommodations, unless the mitigating measure itself limits a major life activity.

(ii) A physiological disease, disorder, condition, cosmetic disfigurement, or anatomical loss limits a major life activity if it makes the achievement of the major life activity difficult.

(iii) “Major life activities” shall be broadly construed and includes physical, mental, and social activities and working.

(2) Any other health impairment not described in paragraph (1) that requires special education or related services.

(3) Having a record or history of a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment described in paragraph (1) or (2), which is known to the employer or other entity covered by this part.

(4) Being regarded or treated by the employer or other entity covered by this part as having, or having had, any physical condition that makes achievement of a major life activity difficult.

(5) Being regarded or treated by the employer or other entity covered by this part as having, or having had, a disease, disorder, condition, cosmetic disfigurement, anatomical loss, or health impairment that has no present disabling effect but may become a physical disability as described in paragraph (1) or (2).

(6) "Physical disability" does not include sexual behavior disorders, compulsive gambling, kleptomania, pyromania, or psychoactive substance use disorders resulting from the current unlawful use of controlled substances or other drugs.

(n) Notwithstanding subdivisions (j) and (m), if the definition of "disability" used in the federal Americans with Disabilities Act of 1990 (Public Law 101-336) would result in broader protection of the civil rights of individuals with a mental disability or physical disability, as defined in subdivision (j) or (m), or would include any medical condition not included within those definitions, then that broader protection or coverage shall be deemed incorporated by reference into, and shall prevail over conflicting provisions of, the definitions in subdivisions (j) and (m).

(o) "Race, religious creed, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, age, sexual orientation, or veteran or military status" includes a perception that the person has any of those characteristics or that the person is associated with a person who has, or is perceived to have, any of those characteristics.

(p) "Reasonable accommodation" may include either of the following:

(1) Making existing facilities used by employees readily accessible to, and usable by, individuals with disabilities.

(2) Job restructuring, part-time or modified work schedules, reassignment to a vacant position, acquisition or modification of equipment or devices, adjustment or modifications of examinations, training materials or policies, the provision of qualified readers or interpreters, and other similar accommodations for individuals with disabilities.

(q) "Religious creed," "religion," "religious observance," "religious belief," and "creed" include all aspects of religious belief, observance, and practice, including religious dress and grooming practices. "Religious dress practice" shall be construed broadly to include the wearing or carrying of religious clothing, head or face coverings, jewelry, artifacts, and any other item that is part of an individual observing a religious creed. "Religious grooming practice" shall be construed broadly to include all forms of head, facial, and body hair that are part of an individual observing a religious creed.

(r) (1) "Sex" includes, but is not limited to, the following:

(A) Pregnancy or medical conditions related to pregnancy.

(B) Childbirth or medical conditions related to childbirth.

(C) Breastfeeding or medical conditions related to breastfeeding.

(2) “Sex” also includes, but is not limited to, a person’s gender. “Gender” means sex, and includes a person’s gender identity and gender expression. “Gender expression” means a person’s gender-related appearance and behavior whether or not stereotypically associated with the person’s assigned sex at birth.

(s) “Sexual orientation” means heterosexuality, homosexuality, and bisexuality.

(t) “Supervisor” means any individual having the authority, in the interest of the employer, to hire, transfer, suspend, lay off, recall, promote, discharge, assign, reward, or discipline other employees, or the responsibility to direct them, or to adjust their grievances, or effectively to recommend that action, if, in connection with the foregoing, the exercise of that authority is not of a merely routine or clerical nature, but requires the use of independent judgment.

(u) “Undue hardship” means an action requiring significant difficulty or expense, when considered in light of the following factors:

(1) The nature and cost of the accommodation needed.

(2) The overall financial resources of the facilities involved in the provision of the reasonable accommodations, the number of persons employed at the facility, and the effect on expenses and resources or the impact otherwise of these accommodations upon the operation of the facility.

(3) The overall financial resources of the covered entity, the overall size of the business of a covered entity with respect to the number of employees, and the number, type, and location of its facilities.

(4) The type of operations, including the composition, structure, and functions of the workforce of the entity.

(5) The geographic separateness or administrative or fiscal relationship of the facility or facilities.

(v) “National origin” discrimination includes, but is not limited to, discrimination on the basis of possessing a driver’s license granted under Section 12801.9 of the Vehicle Code.

(w) “Race” is inclusive of traits historically associated with race, including, but not limited to, hair texture and protective hairstyles.

(x) “Protective hairstyles” includes, but is not limited to, such hairstyles as braids, locks, and twists.

(Amended by Stats. 2020, Ch. 36, Sec. 32. (AB 3364) Effective January 1, 2021.)

**Certificate Of Completion**

Envelope Id: 012D877CDC0F477A8968F42570549EE6	Status: Completed
Subject: Please DocuSign: Anti Harrassment AR with Exhibit A.pdf	
Source Envelope:	
Document Pages: 11	Signatures: 3
Certificate Pages: 2	Initials: 0
AutoNav: Enabled	Envelope Originator:
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	Beverly Hills, CA 90210
	gressa@beverlyhills.org
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**Signer Events**

Signature	Timestamp
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Signature Adoption: Pre-selected Style Using IP Address: 198.245.189.166	

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Laurence Wiener lwiener@rwglaw.com Security Level: Email, Account Authentication (None)	<i>Laurence Wiener</i>	Sent: 5/26/2021 11:16:58 AM Viewed: 6/7/2021 3:58:09 PM Signed: 6/7/2021 5:47:28 PM
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George Chavez gchavez@beverlyhills.org Security Level: Email, Account Authentication (None)	<i>George Chavez</i>	Sent: 6/7/2021 5:47:29 PM Viewed: 6/16/2021 1:54:02 PM Signed: 6/16/2021 1:54:54 PM
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Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp

Carbon Copy Events	Status	Timestamp
<p>Jill Doohen            JDoohen@rwglaw.com            City of Beverly Hills            Security Level: Email, Account Authentication (None)</p> <p><b>Electronic Record and Signature Disclosure:</b>            Not Offered via DocuSign</p>	<div style="border: 2px solid blue; padding: 5px; display: inline-block;"><b>COPIED</b></div>	<p>Sent: 5/26/2021 11:16:58 AM            Viewed: 5/26/2021 11:30:59 AM</p>
<p>Shani Parker            SParker@rwglaw.com            City of Beverly Hills            Security Level: Email, Account Authentication (None)</p> <p><b>Electronic Record and Signature Disclosure:</b>            Not Offered via DocuSign</p>	<div style="border: 2px solid blue; padding: 5px; display: inline-block;"><b>COPIED</b></div>	<p>Sent: 5/26/2021 11:16:58 AM</p>

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Notary Events	Signature	Timestamp
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Signing Complete	Security Checked	6/16/2021 1:54:54 PM
Completed	Security Checked	6/16/2021 1:54:54 PM

Payment Events	Status	Timestamps
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