

ORGANIZATIONAL AND PROGRAMATIC POLICY LANGUAGE AND RESOURCES TO PROMOTE NON-DISCRIMINATION & INCLUSION THROUGHOUT THE EASTERN PA COC

INTRODUCTION

This packet contains sample policy language, encouraged practices and tools that can help set a standard of inclusion and safety for all families and individuals who might access services or resources at a given organization throughout the Eastern PA CoC.

There are two layers of policy which must be considered: one for your organization, its employees, etc.; and another to guide interactions between the organization/program and the client. The majority of the policy samples herein are focused on promoting positive interactions with the CoC's end-user, the person who is either experiencing homelessness or who is about to become homeless. That said, the first set of sample policy language and resources can be used by the organization to foster its own internal interactions and culture; and much of the program/client-level language cited in the second set of sample policy language can also be adapted to guide internal organizational policy since the principles are similar for both policy types.

The sample language herein begins where the [CoC's Non-Discrimination and Inclusion Policies](#) leave off, providing a greater level of detail and nuance. **Once any policy(ies) is/are drafted, they should be signed by all employees and the organization's executive director, affirming their commitment to equal opportunity, non-discrimination and inclusion.**

Practical organizational next steps, encouraged programmatic practices as well as wording templates are also included.

FOR INTERNAL ORGANIZATIONAL USE

NON-DISCRIMINATION & INCLUSION LANGUAGE

A positive practice is developing organization-wide Equity and Values Statements which promote inclusion and nondiscrimination. To this end, a sample of each is provided which can be used in their entirety, or some portions thereof, so as to create new or enhance existing statements that organizations may abide by.

SAMPLE EQUITY STATEMENT: “ _____ is committed to fostering, cultivating and preserving a culture of diversity and inclusion.

Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees invest in their work represents a significant part of not only our culture, but our reputation and organization’s achievement as well.

We embrace and encourage our employees’ differences in age, color, disability, ethnicity, family or marital status, gender identity or expression, language, national origin, physical and mental ability, political affiliation, race, religion, sexual orientation, socio-economic status, veteran status, and other characteristics that make our employees unique.

_____ diversity initiatives are applicable—but not limited—to our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; transfers; social and recreational programs; layoffs; terminations; and the ongoing development of a work environment built on the premise of gender and diversity equity that encourages and enforces:

- Respectful communication and cooperation between all employees.
- Teamwork and employee participation, permitting the representation of all groups and employee perspectives.
- Work/life balance through flexible work schedules to accommodate employees’ varying needs.
- Employer and employee contributions to the communities we serve to promote a greater understanding and respect for the diversity.

All employees of _____ have a responsibility to treat others with dignity and respect at all times. All employees are expected to exhibit conduct that reflects inclusion during work, at work functions on or off the work site, and at all other company-sponsored and participative events. All employees are also required to attend and complete annual diversity awareness training to enhance their knowledge to fulfill this responsibility.

Any employee found to have exhibited any inappropriate conduct or behavior against others may be subject to disciplinary action.

Employees who believe they have been subjected to any kind of discrimination that conflicts with the company's diversity policy and initiatives should seek assistance from a supervisor or an HR representative." ^{i 1}

SAMPLE VALUES STATEMENT: "Fundamentally, _____'s work to advance racial justice is embedded in the following core values:

- People of Color: We value the voices, experiences, cultures, intellect and multidimensionality of people of color.
- Justice: We value fairness, the best foundation for unity among all people.
- Transformation: We value the ability of individuals and systems to change in ways that make racial justice possible. We recognize the importance of struggle in fueling transformation.
- Bridging: We value the insights, relationships and holistic understandings that are deepened when divergent paths come together.
- Expression: We value voicing and sharing our viewpoints with integrity even when difficult, unpopular or risky.
- Adaptability: We value relevance and resourcefulness in the face of changing social, economic, political and ideological environments.
- Delight: We value making space for laughter, beauty, and joy in the work of social change." ⁱⁱ

PRACTICAL ORGANIZATIONAL NEXT STEPS

The following examples are tangible ways in which your organization can take action to promote equity and nondiscrimination from within the organization itself. Additional examples can be found in the [CoC's Non-Discrimination and Equity Policies](#) under the *CoC's Commitments to Promote Inclusion and Address Discrimination*.

- ✓ Regularly promote racial and other equities throughout communication platforms. ⁱⁱⁱ
- ✓ Maintain a topic-area webpage on racial equity in homelessness and housing that includes up-to-date research and information for funders and the general public. ^{iv}
- ✓ Add non-discrimination and inclusive language to all contracts and MOUs, holding all parties to the same standards.
- ✓ Hire minority contractors when there are opportunities to do so. ^v
- ✓ Commit to diversity of speakers in all in-person and virtual presentations, panels, public talks, and other programs. ^{vi}
- ✓ Intentionally consider and select members from underrepresented and priority populations for the board of directors and staff (African-American, Native American, Latin(x), and the LGBTQ community). ^{vii} The diverse board of directors should reflect the

¹ Should you choose to use this statement, or a portion thereof, the statement must be cited as it is in the footnotes.

community it serves. It should be ensured that minorities are not just employed in direct-service positions, but also hold leadership/decision-making positions. ^{viii}

- ✓ Select staff and members for board service whose values include racial equity and social justice. ^{ix}
- ✓ Provide regular learning and training for board and staff to build capacity around racial and other inequities; including explicit training on structural and historic racism and its impact on systems and policies. ^x
- ✓ Ensure that all programs and policy priorities are developed using a racial equity lens. ^{xi}
- ✓ Use an intersectional lens and analysis to understand how experiences of systemic racism and homelessness are also shaped by gender and gender identity, socio-economic status, sexual orientation, and other factors, so that our analysis and strategies respond to the diverse experiences of people served. ^{xii}
- ✓ Ensure that policies in governance and organizational administration are conducted using a racial equity lens. ^{xiii}
- ✓ When looking at policy/ies, mission and/or vision statements, make sure they include language affirming your commitment to inclusion, not just non-discrimination language. ^{xiv}
- ✓ Adopt a shared language, such as what was provided in Appendix B of the [CoC's Non-Discrimination and Inclusion Policies](#).
- ✓ Include a Race Equity Impact Assessment in your internal evaluations. These questions can help you begin your race equity impact assessment:
 1. Are all racial and ethnic groups that are affected by the policy, practice or decision at the table?
 2. How will the proposed policy, practice or decision affect each group?
 3. How will the proposed policy, practice or decision be perceived by each group?
 4. Does the policy, practice or decision worsen or ignore existing disparities?
 5. Based on the above responses, what revisions are needed in the policy, practice or decision under discussion? ^{xv}
- ✓ Allocate prevention funding based on a *Selected Group Strategy* ^{xvi}.

GOAL: Keep marginalized populations housed targeting assistance to those who likely face significant structural barriers that make loss of housing more likely. If correctly designed, adequately resourced, and informed by people most impacted, these strategies will reduce racial disparities in who experiences homelessness (sample budget available in footnoted hyperlink)

TARGET POPULATION: Groups or populations with a particularly high risk of homelessness as members of a protected class.

KEY PARTNERSHIPS: People with lived experience, Civil Legal Aid/Eviction Courts, Advocacy organizations and Non-profits primarily led by people of color and primarily serving the selected target population(s)

- ✓ Not sure how your organization measures up in terms of promoting equitable practices? Check out CommunityWise Resource Centre's publication: [Anti-Racist Organizational Change: Resources & Tools for Nonprofits](#). Pages 35-43 will be especially helpful in terms of performing an organizational self-assessment; examining existing policies, hiring practices, and mission statements; as well as learning from their processes, step-by-step, with some real tangible and practical advice in creating a more inclusive organizational culture.

FOR PROGRAMMATIC/ CLIENT-LEVEL USE

SAMPLE POLICY LANGUAGE

Many of the policy samples below have already been adapted for more general use due to the CoC's broad service delivery base, however individual programs can certainly tailor the language to be more specific to better suit their needs (i.e., to specify youth, etc.). To formulate your policies, begin with relevant language from the [CoC's Non-Discrimination and Inclusion Policies](#) and add as much specificity as you need to with the suggestions provided.

REGARDING NON-DISCRIMINATION & INCLUSION

SAMPLE: "Recognizing that prejudice, discrimination and stereotyping are prevalent throughout society and dedicated to the creation of a safe, secure space for those seeking services with us, it shall be the policy of _____ to maintain and promote a facility that provides the highest quality of services to youth regardless of their actual or perceived sexual orientation and/or gender identity. Individuals receiving services at _____ shall receive fair and equal treatment, without bias, and shall be treated in a professional manner." ^{xvii}

SAMPLE: "Employees, volunteers and other individuals involved in providing services shall immediately report any evidence of discrimination, physical or sexual harassment, and verbal harassment to their supervisor." ^{xviii}

SAMPLE: "_____ is committed to providing all individuals and families served by _____ and our contracted provider agencies a safe, healthy, inclusive, affirming and discrimination-free environment." ^{xix}

SAMPLE: "We serve many types of individuals/women/youth here: individuals/women/youth of different races, religions, sexual orientations, gender expressions, and gender identities." ^{xx}

SAMPLE: "_____ empowers people to live healthy and successful lives. _____ celebrates our diversity and advocates for justice and opportunity." ^{xxi}

REGARDING GENERAL PROGRAMMING

SAMPLE: "_____ will take all reasonable steps within its control to meet the diverse needs of the individuals we serve and provide an environment in which clients are treated with respect and dignity, regardless of sexual orientation, gender identity or expression, or other protected categories." ^{xxii}

SAMPLE: "Under no circumstances is any staff member of _____ or its provider agencies to attempt to convince a transgender or gender nonconforming individual to reject or modify their gender identity or gender expression." ^{xxiii}

SAMPLE: "Staff must be able to recognize the signs of distress, support disclosure when appropriate, and follow appropriate protocols for reporting." ^{xxiv}

SAMPLE: “Staff must set a good example and make clients aware that any threats of violence, disrespectful and/or suggestive comments, or gestures toward any individual will not be tolerated. Staff also shall not engage in these behaviors.” ^{xxv}

REGARDING HOUSING AND FACILITIES

SAMPLE: “Individuals shall not automatically be housed according to their birth sex. Decisions shall be made based on individualized needs and should prioritize emotional and physical safety taking into account the individual’s perception of where they will be most secure, as well as any recommendations from the individual’s health care provider. It is most appropriate to house individuals based on their gender identity. If necessary to ensure their privacy and safety, individuals shall be provided a single room, if available.” ^{xxvi}

SAMPLE: “Decisions on housing for a transgender individual must be based on the transgender individual’s needs, and must prioritize their emotional and physical safety. It is critical to include the transgender individual in the decision making process.” ^{xxvii}

SAMPLE: “All individuals receiving services and placement have a right to safety and privacy. In instances when safety or privacy concerns are brought forth, programs and organizations must demonstrate non-discriminatory applied response. Fair and open use of a program and facilities space and features is a right of all. Any client’s discomfort with transgender and /or gender non-conforming identity is not cause for limiting the transgender or gender non- conforming person’s enjoyment and use of the facility and its features, either physically or programmatically.” ^{xxviii}

SAMPLE: “All individuals seeking services have the right to placement and services that align with their gender identity. This right is never contingent upon having received any medical treatment to physically change the body. Likewise, those who do not identify as male or female have a right to placement and services that best supports their own personal safety. No person’s placement or acceptance for service in a sex-segregated facility can be refused based upon a determination that their appearance or behavior does not conform to gender stereotypes. Facilities that legally separate participants by sex must serve all who identify with that gender, without requiring documentation.” ^{xxix}

SAMPLE: “All families, regardless of composition or gender identities within the family, have the right to placement and services in accordance with their needs, including placement in congregate facilities. Perceived non-congruence of gender identity or expression of any family member does not constitute an acceptable reason for refusal of services/placement.” ^{xxx}

SAMPLE: “Facility restrooms/bathrooms/showers and personal care areas must be open for use consistent with gender identity by all program participants. No barriers to the use and availability of restrooms/ bathrooms/showers and personal care areas can be imposed due to appearance or bodily/ physical/biological characteristics. No participant can be required to produce legal documentation of gender identity to determine appropriate use of facilities. It is a violation of the Equal Access Rule to institute specific provisions such as schedules by which transgender program participants can use bathrooms/showers and personal care areas separate from cisgender program participant.” ^{xxxi}

REGARDING LANGUAGE: Paperwork, Names, Pronouns

SAMPLE: “Employees, volunteers, and contractors, when working with clients at _____ shall use respectful language and terminology that does not further stereotypes. ^{xxxii}

SAMPLE: “Employees, volunteers, and contractors of _____, in the course of their work, shall not refer to any individual by using derogatory language in a manner that conveys bias towards or hatred of LGBT people. In particular, employees of _____ shall not imply to or tell LGBT individuals that they are abnormal, deviant, or sinful, or that they can or should change their sexual orientation or gender identity. ^{xxxiii}

SAMPLE: “Employees shall not disclose an individual’s sexual orientation or gender identity to other individuals or agencies, such as healthcare or social service providers or family and friends, without the individual’s permission, unless such disclosure is necessary to comply with state or federal law. ^{xxxiv}

SAMPLE: “All staff must clarify with clients which name and pronouns should be used in which settings—including in conversations with the young person’s family, other providers, etc. ^{xxxv}

SAMPLE: “Personnel should be aware of cultural and generational differences in language related to SOGIE, and should defer to the individual about the language they use to describe their identity, regardless of the name on the individual’s identity documents. ^{xxxvi}

SAMPLE: With respect to gender questions in Homeless Management Information System (HMIS) collection system, program participants must be given all gender response choices and have their selection recorded accordingly. ^{xxxvii}

ENCOURAGED PROGRAMMATIC PRACTICES

The following examples are tangible ways in which your organization can take action to promote equity and nondiscrimination at the programmatic level. Additional examples can be found in the [CoC’s Non-Discrimination and Equity Policies](#) under the *CoC’s Commitments to Promote Inclusion and Address Discrimination*.

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- ✓ Personnel are prohibited from using language that demeans, ridicules or condemns LGBT individuals. Personnel should also avoid words that convey common misconceptions about sexual orientation, gender identity and expression (SOGIE), such as referring to LGBT status as a ‘lifestyle’ or ‘preference.’ ^{xxxviii}
- ✓ Personnel should avoid making assumptions about the SOGIE of individuals or using heteronormative language – meaning language that assumes that everyone is heterosexual or that heterosexuality is preferable or superior to any other identity. An example is asking a boy, “Do you have a girlfriend?” A neutral alternative is, “Are you dating anyone?” ^{xxxix}
- ✓ Staff working with youth must identify and become familiar with community resources to support LGBTQ clients. ^{xl}

- ✓ Personnel should signal openness and acceptance through nonverbal and environmental cues. An example is displaying LGBT-affirming images, symbols or quotations, such as the equal sign or rainbow flag.^{xli}
- ✓ Include magazines and materials in your waiting room which promote inclusion (i.e., LGBT-affirming, representation of minority populations). Where possible, employees shall display materials, such as “safe zone” or “hate-free zone” posters that convey to youth that the facility maintains an inclusive, affirming environment.
- ✓ Employees should model positive behavior when interacting with clients.^{xlii} A great way to show LGBTQ individuals and others that your organization will be respectful of them is to model the respectful use of names and pronouns. Have staff wear name tags/use business cards with pronouns. When staff introduce themselves to young people, ask them to say their names and pronouns. For example: “Hi, my name is Aaron! I use the pronouns he, him, his and they, them, theirs.”^{xliii}
- ✓ Ask as few questions as possible that might be seen as invasive. For example, sex at birth may not need to be known, in which case it can be omitted from the form. However, if you ask questions about a person’s sex, you should also ask about their gender identity.^{xliiv}
- ✓ Adapt intake form to include: committed partner relationship status, and non-binary gender identity, intersex, transgender MtoF, FtoM options^{xliv}

WORDING TEMPLATES

Following are two examples of how information can be collected in a way which lets the participant know that staff are taking their preferences into account.

NAME^{xlvi}

Legal Name*: _____ Chosen Name: _____

*Although we will only ever refer to you using the name you use, we are required for insurance purposes to collect your legal name (if applicable).

PRONOUNS/CONTACT INFO^{xlvii}

Home phone: _____ Is it ok to leave a message/voicemail at this number? Y/N
 What name and pronouns should we use when calling this number? _____

Work phone: _____ Is it ok to leave a message/voicemail at this number? Y/N
 What name and pronouns should we use when calling this number? _____

Cell phone: _____ Is it ok to leave a message/voicemail at this number? Y/N
 What name and pronouns should we use when calling this number? _____

i	Reprinted with permission. 2020. ©Society for Human Resource Management.”
ii	Race Forward: The Center for Racial Justice Innovations
iii	Funders Together to End Homelessness: Commitment to Racial Equity
iv	Funders Together to End Homelessness: Commitment to Racial Equity
v	Opening Doors Fairfield County (ODFC) CoC’s Statement on Equity
vi	Funders Together to End Homelessness: Commitment to Racial Equity
vii	Funders Together to End Homelessness: Commitment to Racial Equity
viii	The School District of Philadelphia: Office of Strategic Partnerships (2020) Racial Equity Guidance
ix	Funders Together to End Homelessness: Commitment to Racial Equity
x	Funders Together to End Homelessness: Commitment to Racial Equity
xi	Funders Together to End Homelessness: Commitment to Racial Equity
xii	Funders Together to End Homelessness: Commitment to Racial Equity
xiii	Funders Together to End Homelessness: Commitment to Racial Equity
xiv	CommunityWise Resource Centre (2017) Anti-Racist Organizational Change: Resources & Tools for Nonprofits
xv	Annie. E. Casey Foundation (2014) Race Equity and Inclusion Action Guide
xvi	HUD Exchange, Training (2020) Targeting Homeless Prevention in the Midst of Covid-19
xvii	Adapted from Virginia Anti Violence Project
xviii	Virginia Anti Violence Project
xix	Adapted from NYC Administration for Children Services
xx	Adapted from True Colors Fund
xxi	Adapted from True Colors Fund
xxii	Adapted from National Center for Lesbian Rights
xxiii	Adapted from NYC Administration for Children Services
xxiv	NYC Administration for Children Services
xxv	Adapted from NYC Administration for Children Services
xxvi	Adapted from the National Center for Lesbian Rights
xxvii	Adapted from NYC Administration for Children Services
xxviii	Philadelphia CoC’s Non-discrimination Policy
xxix	Philadelphia CoC’s Non-discrimination Policy
xxx	Philadelphia CoC’s Non-discrimination Policy
xxxi	Philadelphia CoC’s Non-discrimination Policy
xxxii	Adapted from National Center for Lesbian Rights
xxxiii	National Center for Lesbian Rights
xxxiv	Adapted from National Center for Lesbian Rights
xxxv	NYC Administration for Children Services
xxxvi	Adapted from National Center for Lesbian Rights
xxxvii	Philadelphia CoC’s Non-discrimination Policy
xxxviii	Adapted from National Center for Lesbian Rights
xxxix	Adapted from National Center for Lesbian Rights
xl	NYC Administration for Children Services
xli	Adapted from the National Center for Lesbian Rights
xlii	Adapted from the National Center for Lesbian Rights
xliii	True Colors Fund, Inclusive Paperwork Guidance
xliv	True Colors Fund, Inclusive Paperwork Guidance
xlv	Bradbury-Sullivan LGBT Community Center Training Institute
xlvi	Adapted from True Colors Fund, Inclusive Paperwork Guidance
xlvii	True Colors Fund, Inclusive Paperwork Guidance