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Area Human Resources
Applicability Aspirus System Wide
References Courier, NEO Contracts, Orientation + 2 more

Harassment & Discrimination Free Workplace Policy

SCOPE:

- All Aspirus Health Business Units

STAKEHOLDERS

- Employees
- Physicians & APCs
- Volunteers
- Vendors
- Contract Staff

PURPOSE:

Aspirus is committed to a work environment in which all individuals are treated with respect and dignity. Each individual has the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices including harassment. Therefore, Aspirus expects that all relationships will be businesslike and free of bias, prejudice, and harassment.

DEFINITIONS:

Harassment: Verbal or physical conduct that degrades or shows hostility or aversion toward an individual because of race, color, religion, gender, sexual orientation, ancestry, national origin, age, disability, marital status, citizenship, height, weight, or other characteristic protected by law or that of his/her relatives, friends, or associates, and that:

- Has the purpose or effect of creating an intimidating, hostile, or offensive work environment;
- Has the purpose or effect of unreasonably interfering with an individual's work performance; or
- Otherwise adversely affects an individual's employment opportunities.

Harassing conduct includes, but is not limited to: labels, slurs, or negative stereotyping; threatening, intimidating or hostile acts; denigrating jokes; and written or graphic material that denigrates or shows hostility or aversion towards an individual or group, that is placed anywhere on the employer's premises, circulated in the workplace, and/or circulated or engaged in while off duty, if the impact of such conduct meets the definitions in this policy.

Sexual Harassment: Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. Sexual harassment includes conduct directed by a person at another person of the same or opposite gender and may include a range of subtle and not so subtle behaviors.

Sexual harassment exists when:

- Submission to this type of misconduct is made either as an explicit or implicit term or condition of employment; or
- Submission to or rejection of this type of misconduct is used as the basis for employment decisions affecting the person who did the submitting or rejecting or affecting others; or
- The conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile, or offensive environment.

Examples include, but are not limited to:

1. Sexually suggestive or off-color comments or jokes;
2. Sexual flirtation, innuendo, advances, propositions, or other sexual activities;
3. Unprofessional touching, such as massages, embracing, or inappropriately putting an arm around another employee;
4. Repeated and unwelcome invitations for social interactions outside of the workplace;
5. Sexual or racial slurs, derogatory remarks, or offensive gestures;
6. Displaying or distributing sexually explicit or otherwise off-color materials, including books, magazines, articles, pictures, greeting cards, photographs, drawings, cartoons, and e-mail messages; and
7. Including or excluding any individual from workplace activities, assignments, or responsibilities based on their refusal to participate in or tolerate sexual or other forms of harassment or based on other factors not related to job performance or legitimate business reasons.

Discrimination: Any type of improper conduct, language, or employment action based on race; age; sex

or sexual orientation; gender identity; creed or religion; color; disability; marital status, citizenship, or veteran status; membership in the National Guard, state defense force, or reserves; national origin or ancestry; arrest or conviction record; use or non-use of lawful products off Aspirus' premises during non-working hours; or any other characteristic protected by law.

Discriminatory Harassment: Unwelcome actions of a non-sexual nature that affect the terms and conditions of employment or create a hostile or offensive work environment and are based on membership in a protected class.

Protected classes include race (including traits associated with race, including but not limited to hair texture and hair styles such as braids, locs and twists), religion, color, creed, national origin, disability, age, marital status, familial status, regard to public assistance, sex, gender identity, sexual orientation and membership or activity in a local human rights commission.

Harassment can take different forms, including ethnic slurs, ridicule, intimidation, workplace graffiti, physical violence, or other offensive conduct directed towards an individual. Other prohibited forms of harassment include jokes, verbal abuse, the display of objects and/or pictures and other offensive conduct relating to an individual's protected class as defined under State and Federal law.

Retaliation: An intentional act in response to a protected activity; and/or any kind of negative action against a current or former employee that takes the form of punishment, and creates a hostile, threatening or uncomfortable environment as a result of their reported complaint or other protected activity.

PROVISIONS:

Aspirus prohibits illegal discrimination or harassment. Aspirus will promptly respond to any reported incidents of harassment or any other form of discrimination. Likewise, intentionally false or malicious accusations that are unfounded may result in appropriate action against the complainant.

Aspirus encourages reporting of all perceived incidents of discrimination, harassment, or retaliation, regardless of the offender's identity or position. Individuals who believe that they have been the victim of such conduct or believe they have witnessed such conduct are encouraged to discuss their concerns with their Supervisor/Human Resources designee.

Casual remarks or one-time instances are generally not considered harassment. In order to qualify as harassment, actions must be severe and pervasive, creating a hostile work environment and therefore affecting the employee's terms and/or conditions of employment.

PROCESS:

Complaint Process

- I. Any individual who believes he or she is a victim of harassment or discrimination by any party (including vendors, patients or any individual on Aspirus property), or who has observed others being possibly harassed or discriminated against, should immediately report the harassment or discrimination to his/her Supervisor/Human Resources designee as soon as possible, either verbally or in writing. All members of management are required, and all employees have an

obligation and are encouraged, to report any situations related to harassment or discrimination.

- II. Once a report of harassment or discrimination is received, it will be conveyed to the appropriate Human Resources designee who will promptly investigate all complaints and take all appropriate and necessary action as follows:
 - A. Conduct a thorough investigation of the allegation(s) to determine if harassment or any form of discrimination occurred.
 - B. Review findings of investigation with department Director (if applicable), and the appropriate Human Resources designee.
 - C. Ensure prompt and appropriate corrective action is initiated by the appropriate Human Resources designee of the accused employee(s) if investigative results support the allegation.
 - D. Decisions regarding the degree of corrective action taken will be made on a case-by-case basis, depending on the facts and circumstances revealed by the investigation.
- I. All complaints will be handled promptly. To the extent that it is possible, Aspirus will take steps to keep aspects of the investigation confidential, including the names of the reporting party and the identify of witnesses. This is not always possible, as the primary objective is a fair investigation and appropriate remedial action.
- II. Retaliation against an individual for reporting harassment or discrimination, or for participating in an investigation of a claim of harassment or discrimination, is a serious violation of this policy and, like harassment or discrimination itself, will be subject to disciplinary action. Acts of retaliation should be reported immediately and will be promptly investigated and addressed.
- III. Any individual who violates this policy will be subject to appropriate corrective action up to and including termination.

REFERENCES:

1. Code of Conduct
2. Corrective Action
3. Equal Employment Opportunity
4. Title VII of the Civil Rights Act of 1964, as amended, 42 USC s. 2000e, et seq.
5. Americans with Disabilities Act of 1990, Title 42 USC s. 12101, et seq.
6. Age Discrimination in Employment Act, 29 USC s. 621, et seq.
7. Wisconsin Fair Employment Law, Wis. Stat. s. 111.31, et seq.
8. Michigan Elliott-Larsen Civil Rights Act
9. Minnesota Human Rights Act

Attachments

Approval Signatures

Step Description	Approver	Date
HR System Policy Committee Chair	Julie Weiks: SENIOR HUMAN RESOURCES BUSINESS PARTNER	12/2025
Policy Owner	Elizabeth Van Vuren: HUMAN RESOURCES BUSINESS PARTNER	12/2025

Applicability

Aspirus Chippewa Falls Hospital, Aspirus Divine Savior Hospital, Aspirus Eagle River Hospital, Aspirus Iron River Hospital, Aspirus Ironwood Hospital, Aspirus Keweenaw Hospital, Aspirus Lake View Hospital, Aspirus Langlade Hospital, Aspirus Medford Hospital, Aspirus Medical Group Inc., Aspirus Merrill Hospital, Aspirus Post Acute Care/MedEvac, Aspirus Rhinelander Hospital, Aspirus St. Luke's Hospital, Aspirus Stanley Hospital, Aspirus Stevens Point Hospital, Aspirus Tomahawk Hospital, Aspirus Wausau Hospital, Aspirus Wisconsin Rapids Hospital, Aspirus, Inc., Howard Young Medical Center

References

Courier, NEO Contracts, Orientation, Orientation Providers, Template: Policy