

MEMORANDUM

TO: All Staff and Customers

FROM: George Iranon, CEO

SUBJECT: Internal Grievance Response Process

REFERENCES: Customer rights form
Grievance form

I. PURPOSE

This policy provides potential, previous and current customers, volunteers and employees with a mechanism to present a formal written grievance to the organization that ensures objectivity, impartiality and confidentiality while meeting the intent of existing employment law.

II. PROCEDURE

If an individual feels the organization or one of its employees has not appropriately addressed an issue that directly affects his or her work, services, his or her position in the work place, or the work place environment itself, he or she is encouraged to submit a grievance form to formally seek internal resolution and satisfaction.

Management responsibility

All management personnel and Career Path Services' Equal Employment Opportunity Officer are required to present to the CEO any formal written grievances provided to them by subordinates or customers within one business day. If the grievance is not submitted by the aggrieved within 30 calendar days of the alleged incident, the complaint shall be considered non-existent.

Investigation and resolution

Upon receipt of the grievance, the CEO or designate will commence an investigation. The director or designate will notify the aggrieved in writing within five business days that the grievance has been received and of the proposed investigation timeline.

All parties involved in the investigation of the grievance will be carefully identified at the start of the process and advised of the confidentiality requirements.

At the completion of investigation, the CEO will issue a decision regarding the complaint. If the CEO concludes that his designee's investigation was not complete, he or she will either conduct a new investigation personally or return the investigation to the designee for additional investigation. The CEO is required to present to the Board of Directors any formal written complaint filed specifically against him. The Board of Directors will investigate and their decision will be final.

The investigation should be completed within 30 calendar days of the initial receipt of the grievance. However, this time frame is a guideline that may be adapted as needed. The CEO will keep the aggrieved and other parties involved informed, in writing, of changes in timelines as they occur.

Appeals

Since all grievances are subject to resolution by the CEO, except those specifically directed at him, the avenue of appeal is to petition the Career Path Services' Board of Directors. The Chairperson of the Board of Directors will lead an Appeal Review Committee made up of him or herself and two other Board Members selected by the Chair. The Appeal Review Committee will determine the process, procedure and timing for review of an appeal by the Appeal Review Committee.

The Board Chairperson will inform the aggrieved in writing of the proposed timeline for completing the Appeal Review within five business days of receiving the appeal.

Witnesses

Witnesses are bound by Career Path Services' internal policies, including confidentiality. Witnesses are required to provide honest answers to investigator questions during the grievance investigation, or may face disciplinary action.

Non-retaliation

This policy prohibits retaliation against anyone who files a grievance or assists in the grievance process. Any employee, participant, volunteer, or applicant who brings a grievance forward will not be adversely affected in terms and conditions of employment or enrollment, nor discriminated against, discharged, terminated, or denied enrollment opportunity from a program operated by Career Path Services because of the grievance.

Reporting

The CEO will deliver an annual report detailing all grievances filed during the program year, their resolutions and analysis of trends to the Board of Directors each September at the annual corporate meeting in executive session.

III. SEEKING EXTERNAL RESOLUTION

Choosing to file or not file a grievance with Career Path Services in no way affects the aggrieved rights to seek legal remedy. If a person feels he or she has been discriminated against based on race, gender, age, veteran status, disability status or any other protected class, he or she has the right to pursue any or all of the following remedies:

- File a formal complaint with the Washington State Human Rights Commission within six months from the date the discriminatory act occurred.
- Commence a civil lawsuit in the proper court having jurisdiction over the issue raised.
- File a formal complaint with the U.S. Office of Equal Employment Opportunity within six months from the date the discriminatory act occurred.
- Customers may also file grievances with the fund source for the program in which they are enrolled. This information is included in the commitment to customer rights and confidentiality form signed at enrollment.
- WIA customer grievances will go to the local Workforce Development Council's Equal Opportunity Officer.

IV. DISSEMINATION

All customers are provided with and sign Career Path Services' customer rights form when they begin services with our agency. They are also provided a copy of Career Path Services' grievance form to ensure they are aware of their grievance rights. The grievance form is also available on www.careerpathservices.org and at the reception desk of each Career Path Services' office.

Employees receive training on this policy at time of hire and sign policy training forms for their personnel files.

V. EFFECTIVE DATE

This policy revision is effective upon approval by the Board of Directors and no later than January 17, 2008.