

EQUAL ACCESS

Fair Housing and Equal Access

The St. Vincent DePaul Mission of Waterbury, Inc. Housing Programs and Emergency Shelter will comply with HUD Fair Housing and Equal Access requirements. The Fair Housing Act prohibits discrimination based on race, color, religion, sex, gender identity/expression, disability, familial status or national origin. Violations of the Fair Housing Act occur when policy or practice has an unjustified discriminatory effect, even when the provider had no intent to discriminate. Where a policy or practice that restricts access to housing based on criminal history has a disparate impact on individuals of a particular race, national origin, or other protected class, such policy or practice is unlawful. In accordance with Fair Housing requirements, these projects will:

- Retain all application records, including outcome and reason for denial;
- Not use any type of blanket policy against subleasing to persons with criminal records;
- May, only as necessary, ensure the security of residents and property, use individualized and detailed assessments of criminal records considering only convictions;
- Ensure that use of such information in admission decisions actually assists in ensuring the security of residents and property; and
- Ensure that any use of a criminal record in admission decisions is absolutely necessary, and that no less discriminatory alternative is available.

In accordance with HUD Equal Access requirements, these projects:

- Are open to all eligible individuals and families regardless of sexual orientation, gender identity/expression, or marital status;
- Will consider any group of people that present together for assistance and identify themselves as a family to be a family and serve them together as such;
- Do not separate families because of age or gender of household members;
- Prohibit inquiring about sexual orientation or gender identity to determine eligibility;
- Provide services for transgendered individuals in a manner that corresponds to the person's identified gender; and
- Take reasonable steps to address participants' safety and privacy concerns.

All St. Vincent DePaul Mission of Waterbury, Inc. staff shall abide by the following Notice and the Notice shall be posted by the Program Managers in a prominent area above the intake desk.

Notice on Equal Access Regardless of Sexual Orientation, Gender Identity, or Marital Status for HUD's Community Planning and Development Programs

This Housing Program receives funding from the U.S. Department of Housing and Urban Department's (HUD) Office of Community Planning and Development (CPD) and MUST comply with the following REQUIREMENTS:

- Determine your eligibility for housing regardless of your sexual orientation, gender identity, or marital status, and must not discriminate against you because you do not conform to gender or sex stereotypes (i.e., because of your gender identity);
- Grant you equal access to CPD programs or facilities consistent with your gender identity, and provide your family with equal access;
- MUST NOT ask you to provide anatomical information or documentary (like your ID), physical, or medical evidence of your gender identity;
- and take non-discriminatory steps when necessary and appropriate to address privacy concerns raised by any residents or occupants, including you.

If you think this program has violated any of these requirements, including any denial of services or benefits, contact your local HUD office for assistance with alleged violations of HUD program regulations. Local offices can be found at:

http://portal.hud.gov/hudportal/HUD?src=/program_offices/field_policy_mgt/localoffices

If you believe you have experienced housing discrimination because of race, color, religion, national origin, disability, or sex, including discrimination because of gender identity/expression, contact 1-800-669-9777 or file a written complaint with HUD at: www.hud.gov "file a discrimination complaint". Persons who are deaf, hard of hearing, or have speech impairments may file a complaint via TTY by calling the Federal Information Relay Service at (800) 877-8339.

To better understand HUD's requirements, the following definitions apply:

- Sexual orientation means one's emotional or physical attraction to the same and/or opposite sex (e.g., homosexuality, heterosexuality, or bisexuality).
- Gender identity means the gender with which a person identifies, regardless of the sex assigned to that person at birth and regardless of the person's perceived gender identity.
- Perceived gender identity means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents.

Equal Access

It is the policy of St. Vincent DePaul Mission of Waterbury, Inc. housing programs and emergency shelter to comply with all relevant federal, state and local laws pertaining to equal employment opportunity and to provide equal access and treatment/services to all people without regard to race, creed, color, religion, national origin, sex, gender identity/expression, age, disability, marital status, mental retardation, and sexual orientation, including transgender and non-gender conforming persons.

Re: Families

The St. Vincent DePaul Mission of Waterbury, Inc. housing programs and emergency shelter will serve ANY and ALL families with children; this includes families of any composition type, e.g., single dad, single mom, same-sex couples, opposite-sex couples, multi-generational, and non-romantic groups who present for services as a family, etc. The program will abide by the definitions of individuals and families as outlined below.

The Equal Access Rule defines family as follows:

Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the following:

1. A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or,
2. A group of persons residing together, and such group includes, but is not limited to:
 - a. A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family);
 - b. An elderly family;
 - c. A near-elderly family;
 - d. A disabled family;
 - e. A displaced family; and,
 - f. The remaining member of a tenant family.

In general, this definition of “family” applies to both the ESG and CoC Program rules. However, the **McKinney-Vento Act, as amended by the HEARTH Act**, distinguishes individuals from families. Therefore, paragraph (1) of the definition of family under the Equal Access Rule is considered an individual under the CoC and ESG programs and the definition of family for these programs is defined as follows:

Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, any group of persons presenting for assistance together with or without children and irrespective of age, relationship, or whether or not a member of the household has a disability. A child who is temporarily away from the home because of placement in foster care is considered a member of the family.

What this means is that any group of people that present together for assistance and identify themselves as a family, regardless of age or relationship or other factors, are considered to be a family and must be served together as such. Further, a recipient or subrecipient receiving funds under the ESG or CoC Programs cannot discriminate against a group of people presenting as a family based on the composition of the family (e.g., adults and children or just adults), the age of any member’s family, the disability status of any members of the family, marital status, actual or perceived sexual orientation, or gender identity.

Here are two examples of how this might apply:

1. **An emergency shelter, transitional housing project, or permanent housing project that serves households with children.** While it is acceptable for a shelter or housing program to limit assistance to households with children, it may not limit assistance to only women with children. Such a shelter must also serve the following family types, should they present, in order to be in compliance with the Equal Access rule:
 - Single male head of household with minor child(ren); and
 - Any household made up of two or more adults, regardless of sexual orientation, marital status, or gender identity, presenting with minor child(ren).

In this example, the emergency shelter or housing program would not be required to serve families composed of only adult members and could deny access to these types of families provided that all adult-only families are treated equally, regardless of sexual orientation, marital status, or gender identity.

2. **A permanent supportive housing project under the CoC Program rule that serves chronically homeless families.** A permanent supportive housing program that serves families must serve all types of families and cannot discriminate against any family based on marital status, actual or perceived sexual orientation of the family members, or gender identities of the family members. Therefore, if two adults present together as a family, the recipient or subrecipient must serve the two adults as a family and may not require proof of marriage and may not limit assistance to couples in a heterosexual relationship.

This policy applies to any recipient and subrecipient of funding under ESG or the CoC Program, including faith-based organizations that accept funds through these programs.

All recipients and subrecipients are encouraged to review their current policies and procedures to ensure that they are compliant with this rule.

Rev.: 9 20/16

Equal Access

General:

The St. Vincent DePaul Mission of Waterbury, Inc. housing programs and emergency shelter is committed to non-discrimination and Equal Access for all persons entering and participating in these programs.

These policies apply to all employees, volunteers, and contractors/vendors of these program.

The St. Vincent DePaul Mission of Waterbury, Inc. housing programs and emergency shelter will serve all persons who are eligible for the project regardless of race, color, religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice, sex, gender identity/expression, disability, marital/familial status, or national origin.

The program(s) or program staff shall not discriminate in any provision of housing or housing case management services based on gender, gender identity/expression.

The program(s) will not consider a client or potential client ineligible because their appearance or behavior that may not conform to gender stereotypes.

Beyond elements necessary for the purpose of providing housing or services, these programs will not ask questions or seek information concerning a person's anatomy or medical history.

The program(s) will use only affirming intake practices and will not require any persons to "prove" gender identity. No staff shall subject any persons or applicants to intrusive questioning or ask any persons to provide anatomical information or documentary, physical, or medical evidence of a gender identity.

The program staff will only use appropriate and inclusive language in its intake, communications, publications, trainings, and other policy documents that affirm the program's commitment to serving all eligible clients in adherence with the Equal Access Rule.

Once the preferred name and gender is established by the program applicant/client, all staff must refer to the client by the name and sex preferred, e.g., he/she, his/her.

Whenever appropriate and possible, the program will make our Equal Access policies publicly available on the agency's website or through other commonly used public notification processes.

Whenever a client wishes to change documents or ID's, St. Vincent DePaul Mission of Waterbury, Inc. housing programs and emergency shelter will work with the CT TransAdvocacy Coalition at P.O. Box 111, Farmington, CT 06034 (860) 255-8812, to provide expertise around the process of changing gender markers on identification or benefit applications or to provide related instruction to clients and staff.

The St. Vincent DePaul Mission of Waterbury, Inc. housing programs and emergency shelter staff will assist clients directly in the process of obtaining ID's or link them to available resources, such as listed above or through GLAD Answers for the LGBTQ Community at GLBTQ Legal Advocates & Defenders, 30 Winter Street, STE 800 Boston, MA 02108 ,Phone: 617-426-1350, Fax: 617-426-3594, Email: gladlaw@glad.org National Center for Transgender Equality, 1400 16th St. NW, Suite 510 Washington D.C. 20036, (202) 642-4542, ncte@transequality.org to ensure they obtain ID, as IDs are required for obtaining employment, accessing benefits, and other essential services important to their self-sufficiency.

Training:

Within the first 2 weeks of service, All St. Vincent DePaul Mission of Waterbury, Inc. housing program (s) and emergency shelter staff, volunteers, and contractors are required to attend training on Equal Access, and read and comply with the policies and practices regarding Equal Access.

Staff training will review the Equal Access Rules, postings, and educational materials, and will include role playing on interventions (staff to staff, staff to resident, and resident to resident).

All training will be coordinated by the Program Manager(s) and all completed training documentation will be retained in the employee's personnel file.

See Equal Access Nondiscrimination Sign-off

Harassment:

Sexual harassment and other forms of harassment, including any conduct which creates a hostile work environment is not allowed in any form and will not be tolerated. Please see Sexual Harassment, Rules of Conduct, and the Code of Ethics Policies.

There are many forms of harassment that may be found to be offensive, aggressive, or intimidating. Some forms of harassment may include, but are not limited to, behaviors by others that create a harassing or hostile work environment, regardless of physical location or proximity, such as:

- Offensive jokes, slurs, epithets or name-calling
- Physical assaults or threats
- Intimidation, ridicule, mockery, insults or put-downs
- Offensive objects or pictures
- Interference with another's work performance

Regarding LGBTQ clients or staff, harassment can also include

- consistently or maliciously not using the person's affirmed/preferred gender pronoun
- asking any questions about a person's body or appearance
- disclosing that a person is transgender or gender non-conforming without consent
- or any means of physical intimidation or harassment

No staff member shall engage in harassment, sexual harassment, or other behaviors of any kind that create a hostile work environment for staff or clients.

Staff will ensure other staff, volunteers, and contractors understand that a client may not present as the way they identify, and they should respect the client's wishes and privacy.

Whenever staff or clients express misinformation/inappropriate concern about their health and safety related to any clients who are non-conforming in gender expression, staff are obligated by policy to correct any misconceptions or misinformation. Educational materials may be found in the Appendix.

Managing and Resolving Conflict:

Any staff member or client has the right to place a complaint/grieve any form of harassment or breach in required conduct policies. (Please see Equal Access Posting, Grievance Procedures, Sexual Harassment, and/or the Non-Discrimination, Equal Employment Opportunity, and Affirmative Action Section 4 Policies.)

The Program Manager(s) is responsible to ensure the Client Grievance Procedure is posted by Manager (s) in the office and common areas and provided to all clients upon admission to the program(s). The Grievance Procedure outlines the process for filing a formal grievance. Any client may file a grievance based on any breach of the client rights by contacting the Client Rights Officer (CRO), Bonnie Cocchiola, at 173 Mark Lane, Apt. #5 in Waterbury, CT 06704 or call her at (203) 757-0567 or (203) 755-0626. All breaches in Conduct may be reported as outlined in the Rules of Conduct Policies and Procedures.

The agency will take immediate action to resolve inappropriate behavior, harassment, or equal access issues by any person (staff, volunteers, contractors or clients). The Grievance process CRO is required to attend training as required by DMHAS. The trainings include a review of the mediation process and resolution in a manner that is transparent and fair and equitable to all parties involved.

Any form of tenant harassment or safety concerns, with written consent, will be immediately reported to the Owner of the leased complex/building. Whether decided through the grievance process or after direct client notification, any client reporting unresolvable serious harassment or safety concerns within his/her current complex/building will be moved to a new residence, as soon as can be made available.

All policy infractions, including those related to discrimination, harassment, and rules of conduct, are subject to the progressive disciplinary process as outlined the Corrective Action Procedure of the org. policies. This includes all staff, contractors, and volunteers of St. Vincent DePaul Mission of Waterbury, Inc. housing programs and emergency shelter. All documentation of sanctions or disciplinary action will be kept in the secured personnel files.

Re: Equal Access—Confidentiality:

Please also refer to General Confidentiality Policies, and Confidentially re: Ensuring a Safe, Healthy, Inclusive, Affirming and Discrimination-free Environment for Persons Identifying as LGBTQIA+

All program staff will maintain the confidentiality of all clients who are transgender or who are in process of gender transformation. This information will be held in the strictest confidence and only released to other staff on a need-to-know basis, and will not be released to any person or party without the client's permission to share this information on a release of information (ROI). Only essential staff, identified by the Executive Director, in consultation with the Program Manager (s), will be informed of a client's transgender status to ensure the client's equal access and safety.

A client's gender that differs from his/her sex assigned at birth is treated as confidential medical information and will not be released to any person, party, or entered into HMIS without a written release. Verbal consent does not constitute authorization to release information.

The program staff upon admission will review with clients their rights as specified in these policies, in the Grievance Procedures, Equal Access Notice, and the Privacy Practices Notice to ensure their understanding, and while deciding to sign any ROI, that they understand the implications of releasing the information they wish to share and the potential impact that disclosure may have on their progress to self-sufficiency.

The staff will treat any client's legal name and/or sex at birth as confidential information unless the client provides written permission and signs an ROI, including the manner and extent to which the client's information will be shared, unless otherwise required by law.

Data Collection:

The staff will only gather information from any applicant or client within an agreed-upon designated private area of the office or their home. No other clients or unapproved staff should be present. This also applies to data entry. The client has the right to privacy, and to request a private space to complete intake and data collection.

The staff will not deny access to any applicant based on differences in gender as outlined on birth certificate and current documents/forms of identification. However, fraud/fraudulent identification may be cause for program ineligibility or immediate discharge.

As outlined on the intake form and updates, the staff will adhere to the client's preferred gender identity and name.

Safety Practices:

Whenever monitoring the client's self-administration of medications, staff will ensure the client is able to easily access their medications (please see medication observation policies), including

any prescribed hormones or other medications as part of their gender-affirming healthcare regime.

Housing search and placement is a collaborative effort, and staff will respect the wishes of the clients who have personal safety concerns regarding proposed housing. Every effort shall be made to accommodate reasonable client requests regarding safety, and housing selection, within the framework of the program's allowable FMR's (budget) and housing availability.

The staff may also make recommendations to accommodate the client's safety concerns within the allotted FMR's (budget) and housing stock available.

For client's placed in housing, any form of tenant harassment or safety concerns, with written consent, will be immediately reported to the Owner of the subleased complex/building. Whether decided through the grievance process or by direct client notification, any client reporting serious harassment or safety concerns within his/her current complex/building will be moved to a new residence, as soon as new housing can be made available.

KEY TERMS

Gender – The term “gender” refers to the behavioral, cultural, psychological, biological and social traits that represent the traditional binary understanding typically associated with one sex or another.

Gender Expression – The term “gender expression” refers to all of a person’s external characteristics and behaviors – such as dress, grooming, mannerisms, speech patterns and social interactions – that are socially identified with a particular gender. Social or cultural norms can vary widely and some characteristics that may be accepted as masculine, feminine, or neutral in one culture may not be assessed similarly in another culture. A person’s gender expression may also be referred to as his or her “gender presentation.”

Gender identity -- means the gender with which a person identifies, regardless of the sex assigned to that person at birth and regardless of the person's perceived gender identity.

Perceived gender identity -- means the gender with which a person is perceived to identify based on that person's appearance, behavior, expression, other gender related characteristics, or sex assigned to the individual at birth or identified in documents.

Gender Transition – The term “gender transition” refers to the process through which a person modifies his or her physical characteristics and/or gender expression to be consistent with his or her gender identity. Gender transition may, but does not necessarily, include psychological and/or hormonal therapy, sex reassignment surgeries and/or other medical or surgical components. The process may also include telling one’s family, friends and/or co-workers, and changing one’s name and/or gender on legal and non-legal documentation.

Sexual Orientation – refers to an individual’s sexual or romantic attraction to another person, whether one is lesbian, gay, straight, or bisexual. “Heterosexual,” “bisexual,” and “homosexual” (gay or lesbian) are all orientations. A person’s sexual orientation is distinct from a person’s gender identity or gender expression.

Sex – is the biologically based presumption that reproductive capability determines a person’s label of female or male. This label is usually based on a doctor’s visual assessment of a baby’s genitalia at birth.

Transgender – The umbrella term “transgender” describes people who experience and/or express their gender differently from conventional or cultural expectations – either in terms of expressing a gender that does not match the sex listed on their original birth certificate (i.e., designated sex at birth) or by physically altering their sex. Not all persons who identify as transgender will undergo the medical treatment associated with a gender transition. The term includes transsexuals and other gender variant people.

Transsexual – The term “transsexual” refers to a person who has changed, or is in the process of changing, his or her physical sex to conform to his or her internal sense of gender identity.

Those transitioning from male to female are often referred to as “MTF” or “transwomen” and those transitioning from female to male are frequently called “FTM” or “transmen.”

Anti-Discrimination Posting

Anti-Discrimination

Client Posting

The St. Vincent DePaul Mission of Waterbury, Inc. housing programs and emergency shelter welcomes individuals who are heterosexual, bisexual, gay, lesbian, transgender queer and/or gender non-conforming of different races, classes, religions, ages, and backgrounds.

The staff is expected to treat you with dignity and respect, and we expect you to treat others with dignity and respect.

Any oppressive or abusive language or actions are not acceptable. If you have any questions about our Rules of Conduct, you may ask a staff member to explain them to you.

If a program participant or staff member is acting in an abusive or oppressive way towards you, you can report this behavior to any staff member or place a grievance in writing on a grievance form. These forms are posted in the Staff Office and Community Room. If you feel that the issue has not been addressed, you can then report your concerns to the Program Manager, Bonnie Cocchiola. If the issue has still not been appropriately addressed, you can bring the issue to Gary Beaulieu, the Executive Director.

We Welcome the Opportunity to Work with You.

TIPS FOR MANAGERS, SUPERVISORS AND ADVISORS

Make it clear to the applicant/client that your conversations will be private and make note of those questions that require outside guidance.

If you are unfamiliar or uncomfortable with the transition process, seek out guidance and/or support from your supervisor and organizations listed in the policies to assist with helping you and the client to manage the change, and change in ID's or other documents, but only if agreed upon by the client and with written consent.

Affirm your support of the individual. If you have concerns about the transition, state those separately from your support of the individual.

Listen carefully to what the individual is telling you and how they would like to be treated. (e.g., Does the individual want to keep the transition as private as possible or want it to be addressed publicly?)

Be open-minded and discuss the transitioning individual's needs and concerns with them.

Clarify that all persons are protected by the anti-discrimination and harassment policy, which prohibits discrimination and harassment based on transgendered status and gender identity/expression.

Ask for suggestions on how you can be helpful and supportive. Discuss the ways that you can assist.

Assist in developing the individual's support network according to his/her wishes.

Manager and advisors should work with the individual to create a communication plan. This may include being on-site with the individual on the first day of housing and office visitation to make introductions, support the individual, ensuring respectful and inclusive services, and remaining available to address any questions or concerns from staff or other clients.

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Accommodating Changes in Family Composition

The CT BOS CoC recognizes that household composition may change during the course of a homeless episode. (For example, a family may enter emergency shelter as a parent with two teenage children but the plan is to re-unite in permanent housing with a younger child who is currently staying with a relative.) To the greatest extent possible, the housing programs and emergency shelter wants to accommodate changes in family composition.

In accordance with the CT BOS Client Bill of Rights (see Appendix), participants in or applicants to our permanent supportive housing project operating within the CT BOS CoC have the right to decide for themselves who is a member of their families and to be served together with their families. A family may include adults and children or just adults of any age, disability, marital status, actual or perceived sexual orientation or gender identity.

This requirement applies whether the family initially presented together upon admission or the family composition changed post admission. It is the intent of our program to allow families to form and change composition during their participation in projects, however that may not be feasible in every situation.

The programs may restrict changes to family composition in the following situations:

- A unit is not large enough to accommodate additional family members in accordance with applicable federal, state, and local standards (Note the units are required to have at least one bedroom or living/sleeping room for each two persons and may not require children of the opposite sex, other than very young children, to occupy the same bedroom or living/sleeping room); and/or
- The funding and services required is not available to meet the needs of the new family composition and required unit.
- Housing the family together would present an imminent health and/or safety risk.

When circumstances prevent our program from accommodating changes to family composition, our staff will assist the family in accessing a different unit or work with their CAN and assist the family in accessing a different project that meets their needs and can accommodate them together as a family.

Rev. 01/2017

Policy on Ensuring a Safe, Healthy, Inclusive, Affirming and Discrimination-free Environment for Persons Identifying as LGBTQIA+

Purpose:

This policy is written to support the CT BOS policies and maintain compliance with Connecticut law and HUD's Equal Access Rule, as well as to promote strategies to provide all people who interact with the agency with a safe, healthy, inclusive, affirming and discrimination-free environment.

Introduction

Persons identifying within the LGBTQIA+ umbrella are at heightened risk of housing instability and homelessness. Connecticut law prohibits discrimination in employment, housing, public accommodations and credit transactions on the basis of a number of protected classes. Connecticut includes all of the following within its protected classes (as well as other classes): sex, transgender status, gender identity, gender expression, sexual orientation, marital status, or civil union status. Retaliation against someone for filing a discrimination complaint is also prohibited.

At the state level, the Connecticut Commission on Human Rights and Opportunities is tasked with enforcing human rights laws that ban illegal discrimination; monitoring compliance with state contract compliance laws and with laws requiring affirmative action in state agency personnel practices; and establishing equal opportunity and justice for all persons in Connecticut through education and outreach activities. At the federal level, HUD's Equal Access to Housing Rules also prohibit HUD funded housing and service providers from using sexual orientation, gender identity or marital status as a basis for denying housing or services to any individuals and their families.

Terminology

Also see terminology above.

LGBTQIA+ is an umbrella acronym that generally stands for lesbian, gay, bisexual, transgender, queer (and/or questioning), intersex and asexual. The acronym is designed to be as inclusive as possible with the "+" including the many individuals who may not identify specifically with any of the listed terms but who identify outside of cisgender and heterosexual norms, for instance, persons identifying as non-binary, genderfluid, Two-Spirit, and other identifiers not contained in LGBTQIA.

Most indigenous communities have specific terms in their own languages for the gender-expansive members of their communities and the social and spiritual roles these individuals fulfill. With over 500 surviving Native American cultures, attitudes related to sex and gender are diverse. Even with the modern adoption of umbrella terms like Two-Spirit, not all cultures perceive two-spirit people the same way or welcome an umbrella term in place of terms already in use by their cultures.

Language is constantly evolving, and individuals may use a wide range of language to describe themselves that may or may not be known by staff. The best practice is to cede control to individuals to define their identities in language that makes sense to them, and reflect the language that individuals use to describe themselves. The list of terminology below is not intended to be exhaustive. The agency acknowledges the evolving nature of language and encourages programs to remain flexible and open to changing terminology. The following resources maintain up-to-date terminology and can be referenced regularly:

- <https://transequality.org/issues/resources/understanding-transgenderpeople-the-basics>
- <https://www.apa.org/pi/lgbt/programs/safe-supportive/lgbt/key-terms.pdf>

Non-Discrimination and Non-Harassment Policy

The agency is committed to treating all individuals with dignity and respect and ensuring compliance with human rights and anti-discrimination laws and regulations. Also see Employee Handbook.

Professionalism and Staff Conduct

The agency expects that all staff and contractors will model appropriate and affirming behavior at all times, as defined by the code of conduct and in this policy. Personally-held beliefs about gender identity, gender expression, perceived gender identity, sexual orientation, civil union status or marital status are not permitted to negatively impact the respectful offering and provision of appropriate services, or the respectful treatment of co-workers, clients or community partners. Under no circumstances may any staff member or contractor attempt to convince anyone identifying as LGBTQIA+ to reject or modify their gender identity, sexual orientation, or gender expression. It is also inappropriate to ask questions regarding sexual practices, except as necessary for clinical assessment or reporting abuse. Authorized staff may inquire about sexual orientation, gender identity, and transgender status only for the purposes of collecting demographic information or as necessary to provide responsive client services. Clients must be informed that disclosure of personal information is voluntary and will not affect eligibility for assistance.

Confidentiality and Privacy

All clients, staff, and community partners have a right to privacy, and the agency expects that all staff

and contractors will respect this right. Accordingly, the agency staff and contractors will:

- Treat as confidential all of the following: sexual orientation, transgender status, gender identity, medical history, and names other than the name the client uses;
- Never disclose any of the above information without the client's permission, unless such disclosure is required to properly serve the individual and is consistent with federal, State and local laws;
- If a client grants permission to share this information, staff and contractors share in a professional and respectful manner only to persons who need the information.

Collection of Demographic information

The agency may collect demographic information about gender identity, transgender status, or sexual orientation. As with all personal information, clients have the right to refuse to answer

these demographic questions. This information is collected as a condition of funding in many instances and is used to report aggregated numbers to funders. Demographic information may not affect eligibility for assistance except in circumstances of sex-segregated facilities, in which case eligibility determinations must be made based on a client's self-reported gender identity without intrusive questioning or being asked to provide anatomical information or documentary, physical, or medical evidence of the individual's gender identity.

Asking about Gender and Name will be conducted in the following manner:

1. Legal Name: _____
2. Name You Use: _____
3. What is your current gender identity? (Check or circle ALL that apply)
 Female Male Gender that is not singularly 'Female' or 'Male' (e.g., non-binary, genderfluid, agender, culturally specific gender) Transgender Questioning Decline to answer Do Not Know
4. What pronouns do you use? (he/him, they/them, she/her, she/they, ze/zim, etc.)

All information should be collected in a private setting. Privacy and confidentiality must be maintained, unless authorization/written consent is provided.

Titles Names and Pronouns

Staff should address individuals by the name, title (e.g., Ms./Miss/Mrs./Mr./Mx.), and pronouns (e.g., he/him/his, she/her/hers, they/them/theirs, or other pronouns) that the individual uses, regardless of the individual's assigned sex at birth, whether the individual has undergone a legal name change, or the individual's gender expression, and without requiring identification or other forms of "proof" of gender identity. If staff are unsure what title, name, or pronoun a person uses, ask "What name do you go by?" and "What pronouns do you use?" "What title do you use?" Once staff have learned a person's name, title, and pronouns, the agency may consider staff refusal to use the correct name, title and pronouns to be a form of harassment discrimination.

Gender Separated Facilities and Services

Some programs, activities, and facilities are gender specific, e.g., a women's shelter or a men's addiction recovery group. HUD's Continuum of Care (CoC) Interim Rule regulates when gender separated facilities are allowable, stating that facilities may be limited to one sex where the facility consists of a single structure with shared bedrooms or bathing facilities such that the considerations of personal privacy and the physical limitations of the configuration of the housing make it appropriate for the housing to be limited to one sex (see 24 CFR 578.93(b)(1)). Where single sex facilities are permissible, it is our policy that all individuals have the right to access such facilities consistent with their gender identity, regardless of gender expression or sex assigned at birth. Clients must be placed in areas according to their self-reported gender identity. No one may be denied access to a facility serving the gender with which a person identifies, regardless of their assigned sex at birth or gender expression. In instances where an individual does not identify with a gender that is singularly "male" or "female" (e.g. non-binary, genderfluid, two spirit, a gender outside the binary, etc.), staff may ask the individual to determine the more appropriate gender-based placement as well as the placement that is most

likely to be the safest for the individual—either placement with males or with females. If anyone requests reasonable accommodations to gain greater privacy, the agency will take reasonable steps to accommodate the individual, for instance, offering single use restrooms, or accommodating “off hour” shower or restroom usage.

Managers will identify all single use available bathrooms as Gender Neutral Restrooms.

For gender separated services, such as a men’s or women’s recovery group, the same policy applies as above. Individuals have the right to access services consistent with their gender identity, regardless of gender expression or sex assigned at birth, and in instances where an individual does not identify with a gender that is singularly “male” or “female,” staff may ask the individual to determine the appropriate gender separated service for themselves.

Safety

LGBTQIA+ identifying people are subjected to greater instances of harassment, bullying, and violence than their non-LGBTQIA+ counterparts. Discrimination can be subtle and often goes unreported and undocumented. Protecting the safety of clients, staff, contractors and community partners who identify as LGBTQIA+ is paramount. The agency will publicly display the anti-discrimination policies and will promptly, accurately and comprehensively document and address all incidences of harassment, bullying, discrimination or violence against LGBTQIA+ clients, staff, contractors or community partners. Staff members who observe harassment based on sexual orientation, gender identity, transgender status, or any other protected class should take action immediately and document such action in relevant case notes and incident reports in accordance with the agency’s policies. Clients who feel unsafe in a particular program may raise the issue with program staff, CT BOS or the CT Commission on Human Rights and Opportunities (see Violations). See Anti-Discrimination Posting. Posting should be displayed in prominent public areas to better ensure a welcoming environment.

Health Care

The agency staff will enact healthcare and medication policies that apply equally to all persons, including gender-affirming medications. Clients identifying as LGBTQIA+ may need access to health services such as gender-affirming medications, surgeries, healthcare services or personal hygiene products, all of which are highly personal. Staff should make every effort to connect clients to known gender affirming healthcare providers for any medical needs. If not known, staff should see their supervisor for assistance with identifying these providers.

Dress Code

Dress codes will apply equally to all genders and not include gender-specific dress code elements. For instance, the program can apply an equal standard of length to any clothing, without referring to the clothing, for example, as “women’s skirts” or “men’s shorts.” Staff and clients should never be required to wear clothing or meet grooming standards that are inconsistent with their gender identity or expression, or be forbidden from wearing clothing consistent with their gender identity or expression. The agency will not hold employees or clients to different dress and grooming standards based on gender identity or perceived gender identity.

Violations

Any known discrimination must be reported to a supervisor as soon as possible to promptly document and address all incidents of harassment, bullying, discrimination, and/or violence. Any employee or contractor of the agency who discriminates against, harasses, or violates the rights of an individual identifying as LGBTQIA+, or who retaliates against any individual who opposes such action, is subject to disciplinary action, and the organization subject to sanctions and penalties imposed by the funded agency, the courts, the CT Commission on Human Rights and Opportunities, the CT Department of Mental Health and Addiction Services, and the CT Department of Housing. CT BOS may monitor recipient, subrecipient and contractor compliance with this policy and human rights and anti-discrimination laws and regulations. When making decisions regarding project funding, the CT BOS Steering Committee may consider a pattern of non-compliance or failure to promptly and adequately address non-compliance. Complaints of harassment, discrimination, retaliation, or the creation of a hostile work environment may be reported to any of the following:

- The CT Commission on Human Rights and Opportunities

Phone: 860-541-3400

Connecticut Toll Free: 1-800-477-5737 TDD: 860-541-3400

- CT BOS Grievance Committee in writing via e-mail (ctboscoc@gmail.com) or by phone at (917) 449-3918. CT BOS can also assist in determining how best to make a report directly to a provider agency.

In line with our Equal Access Policies, the agency will make every reasonable effort to:

- Create and maintain an inclusive organizational culture that promotes equity;
- Recruit, retain and promote qualified people with lived experience of homelessness (PWLEH) and people who identify as BIPoC and LGBTQIA+ within the staff and on the Board;
- Engage PWLEH in meaningful opportunities to shape homeless services programs;
- Continue ongoing collaborative partnerships to better promote a culture of inclusion, and equal access to marginalized persons who require services;
- Continue consumer surveys to gather input for necessary change; and
- Analyze relevant data related to Equal Access to create strategies for improvement as needed.

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