

Non-Discrimination Policy and Documentation of Public Notice

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PJI makes available any and all compliance history information, should records exist, upon request

Summary of Federal and State Laws on Volunteering

Under Federal Law, volunteers are protected under the 1997 Volunteer Protection Act (42 USCA Sec. 14501 et seq.), except while driving, and if any wrongdoing was performed without expressed or written permission from a direct supervisor or the Board of Directors, if it was performed with gross, wanton, or malicious intent, or if it was performed with negligence. The Volunteer Organization Safety Act of 2000 (HR 4224) allows the FBI to create a fingerprint- based system by youth serving organizations.

New Jersey employment laws protect workers' rights in multiple areas, including wages and hours of work, discrimination and harassment, and retaliation for reporting suspected wrongdoing by an employer. Many of these laws apply specifically to "employees," but no single definition of "employee" exists. Some statutes only cover paid employees, while others also apply to independent contractors, unpaid interns, or volunteers. The legal status of unpaid workers, including both interns and volunteers, has been the subject of multiple court battles. The New Jersey Appellate Division recently held that the state's whistleblower statute, the Conscientious Employee Protection Act (CEPA), does not apply to unpaid volunteers. [Sauter v. Colts Neck Volunteer Fire Co. No. 2, No. A-0354-15T1, slip op. \(N.J. App., Sep. 13, 2017\)](#). Considering this decision, it is worth reviewing how various employment statutes in New Jersey view unpaid volunteers and interns.

How to file Complaints

PJI is eager to solve problems objectively and confidentially and as promptly and justly as possible, without any concern over reprisal or recrimination. **In the case where the individual wishes to engage legal representation, this is permissible at any point in the process.**

The formal complaint proceeds as follows:

1. Written Grievance – Present the issue in writing (not via email) to the **CEO and Board Chair, who will carefully investigate, examine, and evaluate the factual basis for the situation to reach a satisfactory solution.** Every effort will be made to provide the volunteer with a written decision, and the reasons thereof, within ten working days from the time the grievance is submitted. If the **appropriate PJI official's** decision is not satisfactory, proceed to step 2.
2. Director Meeting – Within five working days following the receipt of the appropriate **CEO and Board Chair's** decision, the individual should arrange an appointment to present and discuss the issue with the Director. Based on further information provided in this



meeting, or related written documents, the Director may conduct further inquiries to fully consider all relevant facts and circumstances, followed by a final written decision to the employee and others concerned generally within fifteen working days.

Resolution - In some cases, formal disciplinary action may be deemed appropriate. Progressive discipline steps may include, but are not limited to, verbal warnings, written warnings, suspension, and separation from service. PJI retains the right to administer discipline in any manner it deems suitable and any of the steps listed above may be skipped. Separation from service may occur at any time without any progressive discipline steps having been taken. The specific disciplinary action taken will be tailored to the severity of the problem and applied consistently and fairly. If you believe that you have been inappropriately disciplined, you should contact the Board of Directors.

Formal Complaints involving an AmeriCorps Member will include the engagement of EEO Director of AmeriCorps or AmeriCorps designee. Contact information for providing complaints are made available freely by PJI administration upon request.

Public materials demonstrate that the program operates subject to nondiscrimination requirements, including member service agreements, volunteer sign up sheets, Share Fair brochure, Share Fair flyer, and PJI website.

Volunteer Bill of Rights

PJI volunteers have a multitude of rights:

1. The right to be treated as a partner in the successes, volunteer operations and development of PJI.
2. The right to suitable and meaningful assignments, with consideration for personal interest, experience, and time availability.
3. The right to clear and consistent definition of the service expected.
4. The right to two-way communication with the person(s) to whom they are responsible. This includes the right to be heard, to make suggestions and to receive respect for an honest opinion. It includes appropriate, effective, and on-going training, guidance, and feedback about their performance.
5. The right to an orderly, designated place which is conducive to performing service.
6. The right to a supervisor who has the time and ability to offer direction, problem solving assistance and information about the operation and background of PJI.
7. The right to diversity. We value the acceptance of widely different working styles, backgrounds and motivations that can produce meaningful contributions.
8. The right to earn respect, trust, and recognition.
9. The right to receive initial and on-going training as needed.
10. The right to ask for a new assignment when ready for a new challenge.



Volunteer Expectations

Volunteers at PJI should understand the outlined expectations that are critical in growing and developing the current and future volunteer experience. PJI expects volunteers to:

1. support PJI's goals and objectives and do everything in their power to promote and achieve them;
 2. participate in all orientation and training programs;
 3. only undertake assigned duties and always operate under the direction and supervision of staff;
 4. understand and comply with PJI's policies and procedures including its Confidentiality and Conflict of Interest policies;
 5. act professionally, appropriately, and respectfully with staff, clients and board members;
 6. notify PJI in advance if you wish to change your volunteer hours or schedule;
 7. be open and honest in all their dealings with PJI;
 8. report any conflict of interests, promptly, to their supervisors;
 9. provide at least two weeks' notice if ending the volunteership early;
- comply with all federal, state, and local laws at all times.

Equal Volunteer Opportunity

Our policy at PJI ensures equal opportunity for our employees, volunteers, board members and clients and does not discriminate because of age, color, race, gender, sexual orientation, religion, national origin, physical or mental disabilities, or membership or non-membership in any lawful organizations. This non-discrimination policy also applies to all applicants for employment, volunteer services, and board selection. All decisions about volunteers will be based on merit, qualifications, competence, organizational needs, skill level and ability. All aspects of volunteering, including selection, placement, training, assignments, transfers, disciplinary actions and termination are at the supervisor's discretion and should not be influenced by a volunteer's ethnicity, religion, age, gender, sexual orientation, national origin, veteran status, physical or mental ability, **political affiliation**, or other characteristic protected by law.

Accommodations for Disabilities

If a volunteer has a disability that affects their ability to perform service, they should contact their supervisor to discuss the appropriate accommodations to be made for them to perform their volunteer service safely and effectively. The volunteer should provide a statement from a physician describing the extent of the disability and limitations that may be necessary for PJI to make the proper accommodations. The volunteer's disability or condition(s) will remain confidential; however, depending on the accommodations needed, various departments and staff may be informed for the purpose of such accommodations. The volunteer will be advised of all information that may be discussed.



Conflict of Interest

Princeton Justice Initiative (PJI) is committed to integrity, fairness, and fiscal accountability in conducting its activities. PJI expects its Team Members to share the commitment to these values.

PJI's Duty to the Public

PJI is a 501(c)3 tax-exempt corporation, a New Jersey Registered Charity, and a domestic nonprofit organization. Considering these designations, the IRS and state regulatory and tax officials view the operations of PJI as a "public trust." Accordingly, by law, PJI is subject to scrutiny by and accountable to governmental authorities as well as to members of the public.

Policy Purpose

There will be times when PJI Team Members become involved in other organizations, causes, and endeavors that may intersect or overlap with PJI's affairs. Sometimes, conflicts may arise with PJI's interests. A conflict also may arise if PJI is contemplating entering a transaction or arrangement that might result in a benefit to the private interest of an officer or director of the corporation or might result in a possible excess benefit transaction.

Policy Application

The policy applies to all persons holding positions of responsibility and trust on behalf of PJI including, but not limited to members of the Board of Directors, Officers, volunteers, committee members, law clerks, interns, and PJI staff. Collectively, these parties are referred to as "Team Members."

Areas in which Conflicts May Arise

Conflicts of interest may arise in the relations of PJI Team Members with any of the following third parties:

- a. Persons and firms supplying goods and services to PJI;
- b. Persons and firms from whom PJI leases property and equipment;
- c. Persons and firms with whom PJI is dealing or planning to deal in connection with the gift, purchase or sale of real estate, securities, or other property;
- d. Competing or affinity organizations;
- e. Donors and others supporting PJI;
- f. Agencies, organizations, and associations which affect the operations of PJI; and
- g. Family members, friends, and other employees.

Interpretation of Policy

The areas of conflicting interest prohibited under this policy, and the relations in those areas which may give rise to conflict, are not exhaustive. Conflicts might arise in other areas or through other relations. It is assumed that Team Members will recognize such areas and relations by analogy.

Full disclosure of all relevant facts and circumstances must be made to the board to determine if a conflict exists. The fact that one of the interests described in this policy exists does not necessarily mean that a conflict exists. If a conflict exists, it must be material enough to be of practical importance to be considered by the board. If the conflict of interest is material, the board will determine if the conflict is averse to PJI's interests.

General Guidelines

1. PJI Board Members have a duty to act in the best interests of its clients in accordance with its mission and policies.
2. Team Members may not accept any payment or article of value from clients, community partners, vendors, or corporate sponsors, except nominal hospitality such as meals or token



recognitions. These may be accepted if the value of the gift is less than \$50.00 (fifty dollars) and where it could be considered ungracious to decline.

3. Financial transactions between Team Members and the organization generally are prohibited unless fully disclosed, provided at or below costs/fair market, and approved by a vote of the Board Directors as evidenced by a formal board resolution.

4. If a Team Member or a close family member has an interest in a proposed transaction with PJI or is involved with an organization involved in a current or pending transaction with PJI, he or she must make full disclosure of such interest before any discussion or negotiation of the transaction occurs.

5. If a conflict, or the potential appearance of a conflict exists, the board members, staff,

6. or volunteer must recuse themselves by not influencing, attempting to influence, or participating in that discussion and/or vote. A board member's presentation of facts and opinion on the issue of conflict shall not be viewed as an improper attempt to influence.

7. Board Members who have a conflict of interest must abstain from discussions, decision making actions, attempting to influence, and voting on any matter in which they have a conflict.

Authorized Conflicts of Interest

Transactions with parties with whom a material conflicting interest exists may be undertaken only if all the following are observed:

- a. The conflicting interest is fully disclosed;
- b. The person with the conflict of interest is excluded from the discussion and approval of such transaction;
- c. The board has determined that the transaction is in the best interests of the organization.

Violations of the Conflicts of Interest Policy

If the board has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose. If, after hearing the member's response and after making further investigation as warranted by the circumstances, the board determines the member has failed to disclose an actual or possible conflict of interest, it may take appropriate actions such as a censure and up to and including removal.

Drug Free Workplace

Illegal drugs, abuse of prescription drugs and alcohol pose a threat to the welfare and safety of clients, staff, and volunteers. Therefore, PJI is a drug free workplace and will take measures to ensure its volunteers are always free from the effects of drugs while on duty.