Subject: Workplace Safety Policy and Procedures Related to COVID-19

Effective Date: July 6, 2020

Revised Date: July 7, 2020

Concordia College (“Concordia” or “the College”) is committed to maintaining a safe environment in response to the Coronavirus disease (COVID-19) pandemic. Concordia is taking steps to protect its employees, students and visitors with the guidance of New York State and local public health officials, the Centers for Disease Control and Prevention (“CDC”), and the Occupational Safety and Health Administration (commonly referred to as “OSHA”).

This policy implements practices that will promote the safety of the College community among employees, students and the community.

Scope
All employees, regardless of their positions, are covered by and are expected to comply with this policy. Appropriate disciplinary action will be taken against any employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension or termination of employment.

Policy and Procedures

Mandatory Online Safety Training
All employees will be required to participate in mandatory online safety training, which will be conducted virtually within two (2) weeks of the reopening of the administrative offices.

Screening Policy
Effective upon the first official day of reopening of the campus, which is July 6, 2020, all employees who will be working on campus, must complete the Daily Self-Assessment Questionnaire (the “Questionnaire”) on a daily basis before coming to campus and commencing their work day. The Questionnaire is not to be completed the night before coming on campus. The College reserves the right to restrict access to campus to any employee who does not comply with this Screening Policy or based on the responses to the Questionnaire.

Face Coverings Policy
Effective today, all employees are required to wear masks or other face coverings when interfacing with colleagues or the public while working on campus. The College will also require that students and visitors wear face coverings when they are communicating with faculty and/or staff on campus, in classrooms or at the College’s additional instructional locations, and when walking in public areas on campus.
New York State requires employers to provide workers with an acceptable mask at no cost to the employees and to have an adequate supply of masks in case of need of replacement.

Employees will be allowed to bring their own face mask or other face covering, provided they are acceptable, including but not limited to, cloth (e.g., homemade sewn, quick cut, bandanna), surgical masks and face shields. If an employee does not own a face mask, a face mask will be provided to the employee by the College.

If an employee is working alone in an office or other work area, the employee is not required to wear their face mask.

Employees are required to wear facial coverings while walking on campus, regardless if they are walking alone, this includes walking in the quad and in hallways.

**Social Distancing Policy**
It is important to remember that face coverings are simply an additional health precaution. They do not guarantee against the spread of the coronavirus, and they do not replace the most important steps you can take to keep yourself and others safe, namely, the practice of 6-20-100. Whether at work or elsewhere, maintain six (6) feet of social distancing whenever possible; regularly wash your hands with soap for twenty (20) seconds; and, if you have a temperature of one hundred (100) degrees or higher, stay home.

When entering or exiting a building, ascending or descending stairs or walking on campus walkways, all employees are directed to a proceed on the right side of all entrances, exits, staircases and walkways.

**Clean Desk Policy**
All employees are required to remove all non-essential items (excludes computer and components, telephone, lamp) from their desktops at the end of each workday in order to facilitate the daily cleaning and disinfection of offices and work spaces. Papers should be stored in closed cabinets or drawers, not piled on the desktop, in order to maintain cleanliness and preserve confidentiality.

Sanitizing wipes dispensers will be available in all buildings to facilitate additional daily intermittent cleaning of computers, electronic devices, telephones, and other surfaces.

**Security Policies**
- Employees must wear their College ID at all times; see College Services Department if you need a lanyard for your ID, or a new ID.
- All package and/or food deliveries must be directed to the Security Office.
- Prior to the Mid-Hudson region’s achieving Phase Four status, all employees must schedule their mail pickup directly with the Director of Security.

**Additional safeguards implemented by the College**
- The College will limit the number of employees/people in any area at one time.
• Employees should not offer handshake greetings and should avoid close contact by maintaining a distance of six (6) feet in the presence of other persons.
• Employees should use video or telephone conferencing when scheduling meetings.
• Departments that receive high traffic, for example, IT, will implement policies to provide services remotely or schedule visits by appointment only.
• Employees should not share phones, tools, desks or other equipment.
• Hand sanitizers have been placed in every campus building.
• When feasible, employees may telework, adopt a staggered schedule or hybrid schedule.
• Employees are encouraged to report any safety and health concerns to Human Resources.

When an employee is sick
• If an employee reports feeling unwell while in the office, the employee will be sent home to contact a healthcare provider for further guidance.
• If an employee tests positive for COVID-19, the employee must immediately stay home for at least fourteen (14) days and consult their health care provider. After fourteen (14) days, the employee must produce medical documentation to HR clearing the employee to return to work.
• In the meantime, the employee's workstation will be sanitized.
• If a sick employee was in contact with other employees, the employees who have had close contact and exposure to the sick employee will be asked to remain home and to contact a healthcare provider for further guidance.

Travel from “Hot Spots”
When an employee returns from travelling to “hot spot”, they are required to quarantine for fourteen (14) days and not work on campus until they have completed the mandatory period of isolation. Note that states or countries may be deemed as “hot spots” by New York State due to the increase of COVID-19 cases, and the “hot spots” may change from time-to-time.

Complaint Process
Concordia will courteously treat any person who files a complaint, and will handle all complaints swiftly and confidentially to the extent possible in light of the need to take appropriate corrective action. Lodging a complaint will in no way be used against the employee or have an adverse impact on the individual’s employment status. Employees are strongly urged to use this procedure. However, filing groundless or malicious complaints is an abuse of the Complaint Policy and Procedures and will be treated as a violation, which may result in termination of employment. See Complaint Policy and Procedures at S/HR/Policies and Complaint Form at S/HR/FORMS. A sample Complaint Form is attached as Appendix A.

Confidentiality
During the complaint process, the confidentiality of the information received, to the extent possible, and the privacy of the individuals involved will be strictly maintained by the College and those involved in the investigation.
Retaliation
No hardship, loss, benefit or penalty may be imposed on an employee in response to:
- Filing or responding to a bona fide complaint of violation of this policy.
- Appearing as a witness in the investigation of a complaint.
- Serving as an investigator of a complaint.

Retaliation or attempted retaliation in response to lodging a complaint or invoking the complaint process is a violation of this policy. Any person who is found to have violated this aspect of the policy will be subject to sanctions up to and including termination of employment.

Conclusion
Any employee in violation of this policy will be subject to disciplinary action, which may lead to termination of employment. We appreciate your understanding and cooperation with this policy.

Concordia College reserves the right to amend this policy at any point in time.
Also, any questions regarding the above policy should be directed to your manager, President’s Council member and/or Human Resources.
Appendix A
Complaint Form
Concordia College New York

You are encouraged to complete this form and submit it to the Director of Human Resources. You will not be retaliated against for filing a complaint. If you are more comfortable reporting verbally or in another manner, the investigator will complete this form, provide you with a copy and follow its Complaint Policy and Procedures by investigating the claim.

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<tr>
<th>COMPLAINANT INFORMATION</th>
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<tbody>
<tr>
<td>Name:</td>
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<tr>
<td>Work Address:</td>
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<tr>
<td>Work Phone:</td>
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<tr>
<td>Job Title:</td>
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<tr>
<td>Email:</td>
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<tr>
<td>Select Preferred Communication Method:</td>
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<td>□ Email  □ Phone  □ In person</td>
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<tr>
<th>SUPERVISORY INFORMATION</th>
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<tbody>
<tr>
<td>Immediate Supervisor’s Name:</td>
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<tr>
<td>Title:</td>
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<tr>
<td>Work Phone:</td>
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<td>Work Address:</td>
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<tr>
<th>COMPLAINT INFORMATION</th>
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<tbody>
<tr>
<td>1. Your complaint is made about:</td>
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<tr>
<td>Name:</td>
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<tr>
<td>Title:</td>
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<tr>
<td>Work Address:</td>
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<td>Work Phone:</td>
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<tr>
<td>Relationship to you:</td>
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<tr>
<td>□ Supervisor  □ Subordinate  □ Co-Worker  □ Other</td>
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2. Please describe what happened and how it is affecting you and your work. Please use additional sheets of paper if necessary and attach any relevant documents or evidence.

3. Date(s) violation occurred:
   Is the violation continuing? □ Yes □ No

4. Please list the name and contact information of any witnesses or individuals who may have information related to your complaint:

   The last question is optional, but may help the investigation.

5. Have you previously complained or provided information (verbal or written) about related incidents? If yes, when and to whom did you complain or provide information?

   Signature: __________________________  Date: ____________________