

# IRONSTONE FARM

## Employee Policy Handbook



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## Ironstone Farm Executive Summary

Founded in 1960, Ironstone Farm began as a breeding and training facility for Thoroughbred horses. During the 1970s, farm owner Richard Donovan expanded the farm's mission by hosting field trips for children with disabilities as a form of community service. These early experiences sparked the evolution of what would become a nationally recognized therapeutic riding program.

In response to growing community needs, Challenge Unlimited Inc. was established to formally develop and offer equine-assisted therapeutic services. Over time, the program grew in both scope and impact. In 1998, Challenge Unlimited supported the formation of Ironstone Therapy—a non-profit affiliate dedicated to delivering medically based therapies through a combination of traditional clinical approaches and equine-assisted therapy ("with the use of the horse").

Recognizing the value and long-term vision of this work, Challenge Unlimited Board of Directors, with support from the Donovan family, launched the Capital Campaign for the Acquisition of Ironstone Farm in 1999. This campaign culminated successfully with the full transfer of property ownership on December 1, 2001, solidifying the farm's future as a permanent home for both therapeutic and educational programming.

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***We are Ironstone.*** A dedicated team of compassionate, collaborative, and mission-driven individuals, united by a passion for service, innovation, and the transformative power of equine-assisted programs. We foster a welcoming, inclusive community where every person—rider, volunteer, staff member, and supporter—is valued. At the heart of our work is a commitment to empowering individuals, strengthening connections, and making a lasting impact—one stride at a time.

## **VISION**

All lives can experience joy and their full potential in an environment where horses and humans connect to create a space for hope and healing

## **MISSION**

Mission Statement: To provide life changing equine assisted services, that foster the human horse connection to help individuals and families with physical, cognitive and emotional challenges experience healing and joy while living their full potential.

We strive to provide a robust set of programs designed to meet the needs of our disability and mental health communities through an experienced and professional staff, enthusiastic and effective volunteers, efficient and effective horse management and care with high-quality facilities

## **VALUES**

Respect, Inclusion, Education and Collaboration

## **Code of Conduct and Workplace Behavior**

### **Expectations and Code of Conduct**

At Ironstone Farm, all employees, volunteers, and visitors are expected to uphold the highest standards of professionalism, courtesy, and integrity. Our organization values respect for the individual and strives to create a safe, inclusive, and collaborative environment for everyone—whether they are here to work, visit, learn, or receive services.

This policy applies in accordance with Massachusetts General Laws Chapter 151B (Fair Employment Practices), the Massachusetts Equal Rights Act, the Americans with Disabilities Act (ADA), and other applicable federal and state laws governing workplace behavior, safety, and discrimination.

### **General Expectations**

All staff and affiliates are expected to:

1. Be respectful and courteous to all participants, clients, volunteers, co-workers, and visitors.
2. Report to work on time, maintain regular attendance, and remain in the work area as needed to fulfill responsibilities.
3. Notify a supervisor in advance when requesting time off or reporting an expected absence.
4. Adhere to all Ironstone Farm policies, including those related to safety, smoking restrictions, and confidentiality.
5. Use only equipment or machinery for which you are trained, certified (if applicable), and authorized.
6. Follow supervisor instructions and maintain consistent, productive, and professional work habits.
7. Report all accidents, injuries, or property damage immediately to a supervisor and complete an incident report.
8. Maintain awareness of and comply with all conduct, safety, and employment policies outlined in this manual.



## Prohibited Conduct

The following behaviors are considered serious violations and may result in disciplinary action, up to and including termination:

1. **Violence or Threats:**  
Committing or threatening acts of violence against others.
2. **Confidentiality Breach:** Unauthorized disclosure or misuse of client, employee, or organizational information, in violation of HIPAA and applicable state privacy laws.
3. **Harassment or Discrimination:** Engaging in discriminatory, harassing, or retaliatory behavior based on any protected characteristic under M.G.L. c. 151B or federal law, including sexual harassment.
4. **Substance Abuse:** Possessing, consuming, or being under the influence of alcohol, illegal drugs, or controlled substances while on duty or on the premises.
5. **Negligent or Reckless Behavior:** Grossly negligent conduct resulting in risk or harm to individuals, animals, or property.
6. **Theft or Property Misuse:** Unauthorized possession, misuse, or removal of Ironstone Farm property or the property of others.
7. **Falsification of Records:** Altering, falsifying, or tampering with timecards, timesheets, or any official documentation.
8. **Attendance Issues:** Habitual tardiness, no-call/no-show absences, or excessive unexcused absenteeism.
9. **Insubordination:** Refusal to follow instructions, defiant behavior, or conduct that undermines management or organizational operations.
10. **Unethical Conduct:** Engaging in dishonest, disloyal, or disruptive behavior contrary to the values and mission of Ironstone Farm.
11. **Improper Use of Technology:** Misuse of electronic systems or data, in violation of Ironstone Farm's confidentiality and security policies.

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## Legal Compliance

This policy is governed by and consistent with the following laws and regulations:

1. Massachusetts General Laws c. 151B – Prohibits employment discrimination and retaliation.
2. Americans with Disabilities Act (ADA) – Requires reasonable accommodations and prohibits discrimination against individuals with disabilities.

3. Occupational Safety and Health Act (OSHA) – Establishes a duty to provide a safe and healthful work environment.
4. Fair Labor Standards Act (FLSA) – Governs timekeeping, recordkeeping, and wage payment practices.

By adhering to this code of conduct, we ensure a workplace where all individuals are treated with dignity and respect, and where our shared mission can thrive in a professional and safe environment.

## **Conduct with Minors Policy**

Ironstone Farm is committed to maintaining a safe, respectful, and legally compliant environment for all individuals, especially minors. Our therapeutic, recreational, and educational programs often serve children under the age of 18, who are considered a particularly vulnerable population. As such, all employees, volunteers, interns, and contractors are held to the highest standard of conduct and responsibility in their interactions with minors.

This policy aligns with and supports Massachusetts law under M.G.L. Chapter 119, §51A (mandating the reporting of child abuse and neglect), as well as federal protections outlined in the Child Abuse Prevention and Treatment Act (CAPTA) and Title IX of the Education Amendments of 1972 where applicable.

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### **Policy Overview and Purpose**

Any actual or perceived misconduct involving a minor can cause serious harm to the child, their family, Ironstone Farm, and the individuals involved. This policy is designed to:

- Protect minors from abuse, neglect, or exploitation
- Protect staff and volunteers from false allegations
- Maintain a transparent and accountable environment

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### **Code of Conduct for Interactions with Minors**

All Ironstone Farm affiliates must adhere to the following standards when working with minors:

#### **1. Visibility and Supervision**

- No employee, volunteer, or contractor shall be alone with a minor in a space where they cannot be observed by others.

- Activities with minors must occur in public, observable, or interruptible spaces, and staff should maintain clear sightlines with each other.

## **2. Transportation of Minors**

Transporting minors is prohibited unless:

- Written consent is provided by the minor's parent or legal guardian.
- At least two authorized adults are present during transport.

## **3. Physical Contact**

- Only necessary and appropriate physical contact (e.g., helping a student mount a horse safely) is permitted.
- Inappropriate, excessive, or intimate physical contact is strictly prohibited.

## **4. Boundaries and Personal Relationships**

- Do not single out minors with unusual attention, gifts, or favoritism.
- Do not meet with minors outside of Ironstone programs. Babysitting, sleepovers, or personal invitations are strictly prohibited unless prior written approval is granted by the Executive Director or Human Resources.

## **5. Romantic or Inappropriate Relationships**

- Dating or engaging in romantic relationships with minors is strictly prohibited and grounds for immediate termination and possible legal action.

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## **Digital Communication with Minors**

To maintain professional boundaries and transparency:

- Communication with minors must occur only via Ironstone Farm-issued email accounts, and the minor's parent/guardian must be copied on all correspondence.
  - Staff may communicate with minors via Slack or organizational messaging platforms only if two adult staff members are present in each message or channel.
  - Private or personal digital communication (e.g., texting, personal email, or social media messaging) with minors is not permitted.
-

## **Reporting Concerns or Violations**

Ironstone Farm requires that any concern about potential misconduct involving minors be reported immediately and confidentially.

### **1. If You Witness or Suspect a Violation**

- Report the concern to the Executive Director or Human Resources immediately.
- An investigation will be conducted promptly in accordance with Ironstone Farm policy and applicable law.

### **2. Preventing Potential Issues**

- If you anticipate a situation that could potentially violate this policy or create the appearance of impropriety, speak confidentially with the Executive Director or Human Resources before the situation arises.

### **3. Reporting by Minors or Parents**

- Minors or their parents/guardians who are concerned about inappropriate conduct or situations may report these concerns directly and confidentially to the Executive Director or Human Resources.
- Ironstone Farm will take all reports seriously and respond in a prompt, professional, and confidential manner.

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## **Mandated Reporting**

Under Massachusetts General Laws Chapter 119, §51A, any staff member who is a mandated reporter (e.g., educators, licensed therapists, healthcare professionals) is legally required to report suspected child abuse or neglect to the Department of Children and Families (DCF).

Ironstone Farm supports all staff and volunteers in fulfilling this legal obligation and will not retaliate against any individual who makes a good-faith report.

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## **Commitment to a Safe and Respectful Environment**

Ironstone Farm is committed to maintaining a culture of mutual respect, accountability, and safety for all individuals—especially minors. We strive to foster meaningful interactions built on trust, professionalism, and the highest ethical standards.

Any breach of this policy will result in immediate disciplinary action, up to and including termination and potential reporting to external authorities.

### **Cell Phone and Mobile Device Usage Policy**

Ironstone Farm is committed to ensuring a safe, respectful, and productive work environment. Mobile devices, including cell phones, smartwatches, and tablets—must be used in a responsible manner that does not interfere with employee safety, work responsibilities, or the well-being of others (including animals).

This policy aligns with Massachusetts safety laws, including the Hands-Free Driving Law (M.G.L. c.90 §13B) and general workplace safety standards under the Occupational Safety and Health Act (OSHA).

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### **General Use Guidelines**

To maintain focus, safety, and professionalism:

- All mobile devices must be set to silent or vibrate mode during lessons, meetings, and while performing job duties.
  - Personal calls, texting, and internet browsing during work hours must be limited to breaks and non-working time, unless part of your assigned duties.
  - Use of mobile devices should never distract from assigned responsibilities or interfere with client service, animal care, or team coordination.
- 

### **Safety and Restricted Use Areas**

To protect employees, clients, and animals:

**Absolutely no mobile device use is permitted while:**

- Handling, grooming, or leading a horse
- Working in paddocks, stalls, or riding arenas
- Operating machinery or farm equipment
- Driving any Ironstone Farm vehicle or using your personal vehicle for business purposes

Per the Massachusetts Hands-Free Driving Law, it is illegal to use a handheld electronic device while operating a motor vehicle. Employees may only use hands-free technology when driving and are expected to pull over safely if a longer conversation is required.

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## **Authorized Use for Emergencies and Equine Team**

- Equine Team members may use mobile devices during active horse-related duties only to report or respond to safety, medical, or veterinary issues.
- Staff must notify a supervisor if they need to use their phone for an urgent personal matter while on duty.

## **Prohibited Activities**

The following are strictly prohibited during working hours or in workspaces:

- Using devices for gaming, streaming, or social media (unless directly related to work responsibilities)
  - Recording audio, video, or photos of clients, coworkers, or animals without prior written permission
  - Using devices in ways that compromise privacy, confidentiality, or create distractions during client care or programming
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## **Disciplinary Action**

Failure to follow this policy may result in:

- Verbal or written warnings
  - Suspension of device privileges while on shift
  - Further disciplinary action, up to and including termination, depending on the severity or recurrence of the violation
- 

## **Commitment to Safety and Respect**

This policy is in place to protect the integrity of our programs, uphold safety standards, and maintain the trust of our clients and coworkers. Employees are expected to use sound judgment and professionalism in all mobile device usage while representing Ironstone Farm.

## **Social Media Policy**

Ironstone Farm and Challenge Unlimited, Inc. recognize that social media is an important communication tool for personal expression and professional engagement. This policy provides guidance to employees, contractors, and volunteers on responsible and lawful use of social

media when referencing, representing, or engaging with content related to Ironstone Farm and its affiliates.

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### **Definition of Social Media**

For the purpose of this policy, "social media" includes, but is not limited to:

- Social networking platforms (e.g., Facebook, Instagram, LinkedIn, Twitter/X, TikTok)
  - Blogs, microblogs, and vlogs
  - Online forums, message boards, and comment sections
  - Chat rooms, Discord servers, and collaborative sites (e.g., wikis)
  - Video sharing platforms (e.g., YouTube, Snapchat)
  - Any digital space that allows for public or semi-public sharing of content
- 

### **Professional Use of Social Media**

Employees who manage or contribute to Ironstone Farm's or Challenge Unlimited's official social media accounts must:

- Follow all organizational guidelines, branding, and tone requirements
  - Protect confidential or sensitive organizational and client information
  - Coordinate with the Executive Director or designated marketing/communications specialist for approval before publishing externally facing content
  - Redirect press or media inquiries to authorized spokespersons
- 

### **Personal Use and Public Representation**

Employees may reference Ironstone Farm or Challenge Unlimited in their personal social media use, provided they do so responsibly and in accordance with the following:

- Employees must not represent themselves as official spokespeople unless explicitly authorized.
  - Posts must not damage the reputation of Ironstone Farm, its programs, or its community.
  - Personal content must avoid defamatory, discriminatory, obscene, or harassing language that could create a hostile work environment as defined under Title VII of the Civil Rights Act and Massachusetts General Law Chapter 151B.
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- Staff may not post confidential or private information (e.g., medical information, client names, internal operations, or financial details).

### **Confidentiality and Privacy**

- Photos, videos, or other media featuring clients, students, minors, or program participants may not be posted without prior written consent from Ironstone Farm and the individual (or parent/guardian if a minor), in accordance with HIPAA, FERPA, and organizational privacy policies.
  - Avoid posting internal workplace conflicts or grievances publicly. These concerns should be addressed through the appropriate internal channels.
- 

### **Interaction with Minors**

- Employees are prohibited from “friending,” messaging, or otherwise engaging directly with minors affiliated with Ironstone Farm on personal social media platforms.
  - All communication with minors must follow approved organizational platforms (e.g., email or Slack) and include a parent/guardian or supervisor as part of the exchange.
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### **Social Media During Work Hours**

- Personal social media use is permitted only during breaks or non-working hours and must not interfere with job responsibilities.
  - Use of organization-owned computers and networks is limited to work-related social media tasks unless otherwise approved.
  - Use of mobile devices for non-work social media activity while handling horses, driving, or operating machinery is prohibited and may be subject to disciplinary action.
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### **Right to Monitor and Consequences**

Ironstone Farm reserves the right to monitor official business use of social media platforms and investigate reports of policy violations. Subject to applicable law, after-hours activity that violates this policy may be reviewed and addressed through disciplinary action, up to and including termination.



Note: Employees are reminded that under the National Labor Relations Act (NLRA), they have the right to engage in "protected concerted activity," including discussing wages, benefits, or working conditions. This policy does not prohibit or restrict such activity.

### **If You're Unsure**

If you are unsure whether a post or social media activity aligns with this policy, please contact the Executive Director or designated marketing/communication specialist for clarification before posting.

### **Remote and Hybrid Work Policy**

Ironstone Farm recognizes that flexible work arrangements, including remote and hybrid schedules, can support work-life balance while maintaining productivity and accountability. This policy outlines the conditions under which remote and hybrid work may be approved and conducted.

### **Eligibility**

Remote or hybrid work is not guaranteed and is subject to organizational need, role responsibilities, and management discretion. Employees whose job duties can be performed effectively off-site may be considered for a remote or hybrid arrangement upon written request and approval from their direct supervisor and the Executive Director or designee.

### **Definitions**

- **Remote Work:** The employee performs their full job duties at a location outside of Ironstone Farm facilities on a regular basis.
- **Hybrid Work:** The employee splits time between Ironstone Farm and a remote location, based on a mutually agreed upon schedule.

### **Approval Process**

1. Employee must submit a written request to their supervisor outlining the desired remote/hybrid schedule.
2. Supervisor evaluates whether the job functions can be performed remotely without disruption.
3. If approved, a Remote Work Agreement will be signed by the employee, supervisor, and Executive Director.

### **Expectations and Requirements**

- **Work Hours:** Employees must maintain agreed-upon hours and be available via phone, email, or organizational platforms (e.g., Slack, Zoom).
- **Productivity:** Employees are expected to maintain the same level of performance and output as if working on-site.

- **Confidentiality:** Employees must adhere to Ironstone Farm's confidentiality, HIPAA, and data security policies at all times.
- **Workspace:** Employees must have a professional, and distraction-free work environment.
- **Equipment:** Ironstone Farm may provide necessary equipment (e.g., laptop), but the employee is responsible for maintaining a reliable internet connection and electricity. All property must be returned upon separation from the organization.
- **Site Visits:** Hybrid and remote employees must attend required on-site meetings, training, or events as requested by management.

### **Massachusetts Wage & Hour Compliance**

All remote and hybrid work arrangements must comply with applicable federal and Massachusetts labor laws, including minimum wage, overtime, meal/rest breaks, and timekeeping. Non-exempt employees must accurately report hours worked, including breaks.

### **Termination of Arrangement**

Ironstone Farm reserves the right to terminate or modify a remote/hybrid work arrangement at any time for operational needs, performance issues, or policy violations. Employees may also request to return to full-time on-site work with adequate notice.

### **Workplace Attire Policy**

Ironstone Farm is committed to maintaining a professional, safe, and inclusive workplace environment. As part of that commitment, all staff—including employees, interns, apprentices, and working students—are expected to present a neat, clean, and appropriate appearance at all times while on the premises.

Attire should reflect the nature of the work performed and align with the safety requirements of the farm, therapeutic programs, and office settings. Proper attire contributes to a culture of respect and professionalism, while ensuring the safety of all individuals, including staff, volunteers, and clients.

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### **General Appearance Standards**

All team members must:

- Wear clean, well-fitting, and appropriate clothing for their duties.
- Avoid garments with rips, stains, or excessive wear.
- Wear closed-toe, slip-resistant footwear to comply with OSHA safety standards when working near animals or in physical settings.
- Dress modestly and avoid clothing that may be considered revealing or disruptive in a professional or therapeutic environment.

## **Role-Specific Attire Guidelines**

Instructors, Therapists, Working Students, Interns, Apprentices, Program and Volunteer Aides

- Acceptable bottoms: Tan, beige, brown, black, or khaki slacks, capris, breeches, athletic-style pants (cotton/spandex), or modest-length shorts
- Tops: Ironstone Farm-branded clothing is encouraged. Non-branded tops are allowed if they are solid-colored and free from logos or inappropriate imagery.
- Footwear: Closed-toe shoes are always required. Boots or riding-appropriate shoes are recommended for safety when working near horses or in paddocks.

## **Office Employees**

- Must follow all the general guidelines above.
- Business casual or professional attire is expected when meeting with clients, visitors, or attending events on or off-site.
- Open-toe footwear is allowed only in non-animal-facing office areas, provided it does not violate any occupational safety rules.

## **Facility and Maintenance Staff**

- Durable clothing such as jeans, work pants, t-shirts, and boots appropriate for manual labor is acceptable.
- All clothing must be free of offensive images or language and allow freedom of movement and safety.

## **Inappropriate Clothing (Prohibited for All Staff)**

- Clothing with profanity, offensive images, or slogans

Revealing or excessively tight clothing, including:

- Spaghetti straps, strapless or thin-strap tops
- Midriff-exposing shirts or crop tops
- Sheer or see-through garments
- Excessively low-cut shirts or pants
- Very low-rise pants that expose undergarments
- Baggy, oversized sweatpants or poorly fitting clothes
- Altered or modified Ironstone Farm logo apparel (e.g., cut-off, cropped, or defaced clothing)

## **Enforcement and Discretion**

Supervisors reserve the right to determine whether attire is appropriate for the workplace and may:

- Ask an employee to change if their clothing violates this policy
- Send an employee home (without pay) to change, if necessary
- Escalate repeated violations to Human Resources for disciplinary review

Employees with religious, cultural, medical, or disability-related attire needs are encouraged to speak confidentially with their supervisor or HR to request reasonable accommodations in accordance with the Massachusetts Fair Employment Practices Act (M.G.L. c.151B) and Title VII of the Civil Rights Act.

## **Confidentiality and Communication Policy**

Ironstone Farm is dedicated to protecting the privacy and dignity of all individuals we serve, including clients, students, staff, volunteers, and partners. As part of our operations, we may access or be entrusted with confidential and sensitive information, including personal, medical, and organizational data.

All employees, contractors, interns, and volunteers are expected to uphold strict standards of confidentiality in accordance with Massachusetts General Laws (M.G.L. c.93H and c.214, §1B), the Health Insurance Portability and Accountability Act (HIPAA) where applicable, and Ironstone Farm's internal privacy practices.

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## **Confidential Information Defined**

Confidential information includes, but is not limited to:

- Client or participant health records
- Behavioral observations and therapy notes
- Personally identifiable information (PII)
- Program or lesson plans
- Staff personnel files
- Internal communications and operations data
- Financial or proprietary information


Any unauthorized disclosure, duplication, or use of this information—whether verbal, written, or electronic—is a serious breach of policy and may result in disciplinary action, including termination, and potential legal liability.

## Communication Guidelines

### Client and Student Discussions

- Do not discuss client/student information in public spaces or during active lessons.
- All communications about clients must occur after sessions, in private, and in a professional tone.

For internal documentation or concerns, include:

 lessons@ironstonefarm.org for lesson-related communication

 volunteer@ironstonefarm.org for volunteer coordination

### Digital Communication

Use only Ironstone Farm-issued email and communication platforms (e.g., Slack, Google Workspace) for work-related correspondence.

- Do not share passwords or allow unauthorized access to work devices or accounts.
- Personal devices used for work must be protected with passwords and secured in accordance with the farm's Written Information Security Plan (WISP).

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### Team Conduct and Public Interactions

Ironstone Farm fosters a collaborative, supportive work culture. While this often creates strong interpersonal connections, we must remain aware that:

- Public conversations, especially in shared or client-facing spaces, must maintain a professional tone.
- Confidential or casual remarks—even unintentionally—can damage client trust or harm the farm's professional image.
- We are ambassadors of Ironstone Farm at all times, and our speech and behavior should reflect the integrity and respect expected in therapeutic and educational settings.

## **Legal and Regulatory Compliance**

This policy aligns with the following federal and Massachusetts laws:

- HIPAA (45 CFR §§160, 164): Governs the use and disclosure of protected health information (PHI) for clients receiving therapy or medical services.
- Massachusetts Privacy Law (M.G.L. c.214, §1B): Protects individuals' rights to privacy.
- Massachusetts Data Security Law (M.G.L. c.93H & 201 CMR 17.00): Requires organizations to safeguard personal information of residents of the Commonwealth.
- Defend Trade Secrets Act (DTSA): Provides federal protection for confidential business information.

## **Breach of Confidentiality**

- Any suspected or actual breach must be reported immediately to a supervisor, the Executive Director, or Human Resources. Breaches will be reviewed and investigated according to Ironstone Farm's disciplinary procedures and may involve legal action depending on the severity of the violation.

## **Questions or Concerns**

- If you are unsure whether something is considered confidential or how to handle a situation, please consult with your supervisor or Human Resources before taking action.

## **Client Medical Information Policy**

Ironstone Farm is committed to upholding the highest standards of confidentiality and professionalism in handling client medical information. Due to the nature of our therapeutic programming, Ironstone therapists and select staff may have access to sensitive health information about clients, including diagnoses, treatment plans, and therapy notes. This information is legally protected and must be handled with strict confidentiality at all times.

## **Confidentiality Requirements**

- All client medical information is protected under applicable federal and state privacy laws, including the Health Insurance Portability and Accountability Act (HIPAA) and Massachusetts General Laws c.93H and c.214, §1B.
- Access to client medical records is limited to authorized personnel whose job duties require such access. Unauthorized review, copying, or distribution of medical information is strictly prohibited.
- Conversations regarding a client's medical condition must only occur with the client's parent or legal guardian, and only when necessary for therapeutic coordination or care.

- These conversations must take place in a private and confidential setting—never in public areas, during active programming, or in front of other clients, families, volunteers, or staff not directly involved in the client’s care.

### **Disclosure Restrictions**

- Client medical information may not be shared with any external party, including other staff members, volunteers, or third parties, without prior written consent from the parent, legal guardian, or client (if of legal age).
- Inquiries from the media, other organizations, or individuals outside the authorized care team must be directed to the Executive Director or Human Resources.

### **Training and Acknowledgment**

- All therapists and staff with access to medical information are required to complete privacy and HIPAA training as part of their onboarding and on an annual basis.
- Employees must sign a confidentiality acknowledgment form confirming their understanding and agreement to comply with this policy.

### **Violations and Reporting**

- Any suspected or actual breach of confidentiality must be reported immediately to the Executive Director or Human Resources.
- Violations of this policy will result in disciplinary action, up to and including termination of employment, and may involve legal consequences.

By adhering to this policy, Ironstone Farm ensures a professional, safe, and legally compliant environment that respects and protects the dignity and privacy of every client we serve.

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### **Sexual and Unlawful Harassment Policy**

Ironstone Farm is committed to providing a workplace that is free from all forms of harassment, including sexual harassment and discriminatory harassment based on any protected characteristic under federal or Massachusetts law. Harassment in any form is strictly prohibited and will not be tolerated under any circumstances.

This policy applies to all employees, interns, volunteers, contractors, supervisors, clients, and visitors. It covers conduct in the workplace and in any work-related setting outside the workplace (e.g., offsite events, social gatherings, and remote communications).

## **Legal Framework**

This policy complies with and is supported by:

- Title VII of the Civil Rights Act of 1964 (42 U.S.C. § 2000e et seq.)
- Massachusetts General Laws, Chapter 151B
- Massachusetts Fair Employment Practices Act
- Equal Employment Opportunity Commission (EEOC) regulations and guidelines
- Massachusetts Commission Against Discrimination (MCAD) enforcement guidance

## **Definition of Sexual Harassment**

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when:

- Submission to such conduct is explicitly or implicitly a term or condition of employment.
- Submission to or rejection of such conduct is used as the basis for employment decisions.
- The conduct unreasonably interferes with an individual's work performance or creates a hostile, intimidating, or offensive work environment.

Sexual harassment may involve individuals of any gender and can occur between people of the same or different genders. The intent of the person engaging in the conduct does not determine whether harassment occurred—the impact on the recipient is what matters.

## **Other Forms of Unlawful Harassment**

In addition to sexual harassment, Ironstone Farm prohibits harassment based on:

- Race or color
- National origin or ancestry
- Age
- Religion or creed
- Sex (including pregnancy and related conditions)
- Sexual orientation
- Gender identity or expression
- Disability (physical or mental)
- Genetic information
- Marital or familial status
- Veteran or military status
- Citizenship or immigration status
- Any other protected status under applicable federal, state, or local law



Examples of unlawful harassment may include, but are not limited to:

- Derogatory jokes, epithets, slurs, or name-calling
  - Insults, offensive objects or pictures, and unwelcome physical contact
  - Interference with work performance or threatening behavior
- 

## **Reporting Harassment**

Employees are strongly encouraged to report harassment immediately, whether they are the target or a witness. Reports may be made to:

- Your immediate supervisor
- Human Resources Administrator
- The Executive Director

Reports can be made verbally or in writing. All complaints will be handled promptly, professionally, and with the highest level of confidentiality possible. Ironstone Farm prohibits retaliation against anyone who makes a good-faith complaint or participates in an investigation.

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## **Investigation Process**

- Ironstone Farm will promptly investigate all complaints, regardless of the identity or position of the alleged offender.
  - The investigation will be thorough, impartial, and respectful of all parties.
  - When appropriate, immediate corrective or disciplinary action will be taken, up to and including termination of employment.
- 

## **No Retaliation**

It is illegal under both Massachusetts and federal law to retaliate against an employee for:

- Filing a harassment complaint
- Participating in an investigation
- Opposing discriminatory practices

Any form of retaliation will result in disciplinary action, including possible termination.

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## External Resources

Employees also have the right to report harassment externally at any time to:

- Massachusetts Commission Against Discrimination (MCAD): [www.mass.gov/mcad](http://www.mass.gov/mcad)
- U.S. Equal Employment Opportunity Commission (EEOC): [www.eeoc.gov](http://www.eeoc.gov)

You are not required to file an internal complaint before accessing these agencies.

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## Commitment to a Safe and Respectful Workplace

Ironstone Farm is committed to fostering a safe, respectful, and inclusive work environment. Every employee, volunteer, and affiliate is expected to uphold this policy and contribute to a culture of integrity, trust, and mutual respect.

## Progressive Discipline

Ironstone Farm is committed to maintaining a productive, respectful, and supportive work environment. To support this commitment, Ironstone Farm utilizes a Progressive Discipline process to address employee behavior or performance that does not meet organizational expectations or job-related standards.

The goal of this process is not to punish, but to identify and correct concerns through clear communication, appropriate documentation, and reasonable opportunities for improvement.

## Purpose

The purpose of progressive discipline is to:

- Clearly communicate concerns related to job performance, behavior, or conduct.
  - Provide employees with reasonable time and support to correct the issue.
  - Establish fair, consistent procedures for addressing workplace concerns.
  - Ensure that serious violations are addressed promptly and appropriately.
- 

## Progressive Discipline Steps

While Ironstone Farm generally follows a progressive sequence, the organization reserves the right to skip steps based on the severity or nature of the misconduct, in accordance with at-will employment standards under Massachusetts and federal law.

### **Step 1: Verbal Counseling**

- Informal discussion between the employee and supervisor.
- Noted in the supervisor's internal records but not placed in the employee's personnel file.
- Identifies the issue and outlines expectations for improvement.

### **Step 2: First Written Warning**

- Formal written warning outlining the issue, expectations for improvement, and consequences for continued noncompliance.
- Placed in the employee's personnel file.
- Requires employee acknowledgment of receipt.

### **Step 3: Second Written Warning**

- Issued if the problem persists or reoccurs.
- May include a Performance Improvement Plan (PIP) with defined goals, timelines, and support strategies.
- The supervisor and employee meet to discuss next steps.
- Placed in the employee's personnel file

### **Step 4: Suspension Without Pay**

- Used for serious or repeated violations.
- Typically ranges from 1 to 5 business days.
- May be implemented immediately pending the outcome of an investigation.
- Time off is unpaid unless the employee is later cleared of wrongdoing, in which case back pay will be issued.
- Placed in the employee's personnel file

### **Step 5: Termination of Employment**

- If previous steps fail to correct the issue or in cases of severe misconduct, termination may occur.
- All terminations are reviewed by the Executive Director or HR before finalization.

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### **Serious Violations That May Warrant Immediate Action**

Some infractions may warrant immediate suspension or termination without prior steps in the progressive process, especially when they pose a risk to others, the organization, or property. Examples include (but are not limited to):

- Theft or misappropriation of Ironstone Farm property or funds
  - Possession, use, or distribution of illegal drugs, cannabis or alcohol on Ironstone property
  - Physical assault, threats, or violence toward others
  - Willful destruction or sabotage of farm property or equipment
  - Gross insubordination or serious violations of safety policy
  - Harassment, discrimination, or retaliation under state or federal law
  - Any violation of the Conduct with Minor Policy
- 

## **Employee Rights**

1. Ironstone Farm complies with all applicable state and federal employment laws, including:
    - Fair Labor Standards Act (FLSA)
    - Massachusetts Wage Act
    - Massachusetts General Laws Chapter 149 and 151
  2. All employees are considered “at-will” employees, meaning either the employee or the employer may terminate employment at any time, with or without cause or notice, unless otherwise specified in a written contract.
- 

## **Appeals and Support**

Employees are encouraged to provide feedback or clarification during any disciplinary process. If an employee disagrees with the disciplinary action taken, they may request a meeting with Human Resources or Executive Director to discuss the matter.

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## **Manager's Role**

Supervisors are expected to:

1. Document concerns and maintain professionalism throughout the process.
  2. Communicate expectations and provide constructive feedback.
  3. Collaborate with HR (when needed) to ensure legal and procedural compliance.
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## **Conclusion**

Ironstone Farm values transparency, fairness, and teamwork. The progressive discipline policy is designed to foster accountability while providing employees with the tools and opportunities needed to succeed.

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## **Vacation and Sick/Personal Time Policy**

### **Salaried Employees**

All full-time salaried employees begin accruing vacation time from the start of employment. Accrual is based on the number of eligible weeks determined at the time of hire. Specific accrual details will be outlined in the employee's offer letter.

### **Hourly Employees**

Hourly employees who work an average of 30 hours or more per week throughout the year accrue vacation based on their weekly schedule as follows:

#### **Vacation Accrual per Pay Period**

##### **Weekly Hours**

30 hours	2.31 hours
35 hours	2.70 hours
40 hours	3.10 hours

### **Eligibility, Accrual, and Use**

To support scheduling and continuity of services:

1. All employees and contractors will be asked to submit a tentative vacation plan at the beginning of each calendar year.
2. Vacation requests must be submitted to the office at least one month prior to the intended time off.
3. Part-time and contract employees may take time off without pay for vacation or personal reasons.

Employees are encouraged to schedule vacations during Ironstone Farm's therapy and lesson closure weeks to minimize disruption.

The vacation request forms are available on the company intranet under "Employee Forms" or by asking your supervisor.

Unused vacation time:

1. Up to 200 hours may be rolled over to the next calendar year.
2. Hours exceeding 200 will be forfeited.

Upon termination, employees will be paid out for any unused, accrued vacation time. Payment in lieu of unused time is not permitted except at termination.

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### **Advance of Vacation Days**

Employees may, with prior written approval from their supervisor, request to take up to 24 hours of vacation before it has been accrued.

If the employee separates from Ironstone Farm and has used more vacation than accrued the unearned balance will be deducted from final wages at the employee's current rate of pay.

### **Sick/Personal Time**

#### **Accrual**

All employees are eligible to accrue and use paid sick/personal time under the Massachusetts Earned Sick Time Law (M.G.L. c. 149, § 148C).

1. Accrual rate: 1 hour for every 30 hours worked
2. Maximum accrual: 40 hours per calendar year
3. For full-time exempt employees, accrual is based on an assumed 40-hour workweek.

#### **Permitted Use of Sick/Personal Time**

Employees may use sick/personal time for:

- Their own illness or preventive medical care
- Care for a child, spouse, parent, or parent-in-law with a health condition
- Routine medical or dental appointments (self or family)
- Addressing the physical, psychological, or legal effects of domestic violence
- Travel related to the above reasons (e.g., pharmacy or doctor)

Employees may use sick/personal time for full or partial day absences, in minimum 1-hour increments. It may not be used to justify tardiness without a valid reason.

Unused time: Employees may carry over up to 40 hours into the following year.

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## **Negative Balance for Full-Time Exempt Employees**

- Full-time exempt employees may go up to 16 hours into a negative balance.
  - Any time off beyond this threshold will be unpaid, and the employee will be temporarily classified as hourly for the pay period.
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## **Absence Notification Procedures**

If an absence, late arrival, or early departure is necessary, the employee must:

1. Notify their supervisor in advance (except in emergencies)
  2. Call the office to report illness
  3. Notify their immediate supervisor via email, Slack or by placing a call to them.
  4. Employees are responsible for coordinating with their supervisor and/or team members, when possible, to ensure appropriate coverage for their work or scheduled shifts.
  5. Supervisors will coordinate internal communication as needed.
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## **Documentation of Sick Time**

Ironstone Farm reserves the right to request a doctor's note for any absence or tardiness, this will be managed on a case-by-case basis and the request should only come from Human Resources or the Executive Director

## **Attendance Expectations**

Regular, reliable attendance and punctuality are essential to Ironstone Farm's mission and operations. Excessive absenteeism or failure to report absences may result in disciplinary action.

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## **Sick/Personal Time and Termination**

Unused sick/personal time is not payable upon termination of employment.

## **Compensation and Benefits**

## **Health Insurance**

Ironstone Farm offers health insurance benefits to all full-time employees. Enrollment and plan details, including coverage options and employee contributions, are available through Human Resources.

In accordance with the Affordable Care Act (ACA), eligible employees working 30 hours or more per week on average may qualify for employer-sponsored health benefits. Employees are encouraged to review enrollment periods and requirements upon hire or when experiencing a qualifying life event.

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## **Reimbursement for Training and Professional Development**

Ironstone Farm supports employee growth and development. Reimbursement for training, certifications, and other professional development opportunities may be available based on the organization's annual budget and management approval.

Employees should submit a written request and supporting documentation in advance to Human Resources for consideration.

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## **Payroll and Compensation**

### **Timesheets and Pay Periods**

All non-salaried employees and independent contractors are required to submit a completed timesheet for hours worked. Timesheets must be:

1. Legibly completed, signed and submitted by noon every other Monday
2. Delivered via email, fax, or dropped off at the main office

Paychecks will be issued by Friday of the same week. If a timesheet is not submitted by the deadline, hours will be recorded as scheduled, and a processing fee may be applied for issuing duplicate checks.

### **Withholdings and Taxes**

Ironstone Farm complies with all applicable federal and state tax laws. The following withholdings apply to employees:

1. Social Security and Medicare (FICA)



2. Federal and Massachusetts state income tax
3. Any additional court order or statutory withholdings

### **Direct Deposit**

Direct deposit is available to all employees and contractors and is strongly encouraged for secure, timely payment. To enroll in direct deposit, please submit a completed authorization form to Human Resources.

### **Equine Benefits**

#### **Riding Lessons**

Employees who work a minimum of 5 hours per week are eligible for a 50% discount on personal riding lessons.

As an alternative, employees may volunteer one feeding shift (minimum three hours) to offset the remaining 50% lesson balance.

#### **Free Riding**

With instructor evaluation and approval, employees may be granted "Free Riding" privileges, which allow for unsupervised riding outside of scheduled lessons.

#### **Requirements:**

1. Call ahead to the designated staff person for day-of approval
2. Ride only the horse or pony assigned that day
3. Requesting a specific horse requires prior herd manager approval
4. Free Riding is allowed only during normal operating hours when equine team members are present

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### **Performance Evaluation and Compensation Adjustments**

#### **Ongoing Performance Feedback**

Supervisors and employees are encouraged to maintain open communication and engage in informal check-ins regarding job performance and expectations on a regular basis.

#### **Annual Performance Reviews**

Each employee will receive a formal performance review once per year in January, with a mid-year check-in around June.

These evaluations are an opportunity to:

1. Discuss progress toward goals
2. Address professional development
3. Align expectations and responsibilities
4. Set performance-based compensation adjustments if applicable

### **Challenges and Workplace Concerns**

Ironstone Farm encourages a transparent and collaborative work culture. If an employee encounters a challenge or concern, they should:

1. Raise the issue promptly with their supervisor
2. Utilize open communication to seek solutions
3. Know that their concerns will be addressed respectfully

Unresolved issues can hinder morale and productivity, and all team members are encouraged to be proactive in maintaining a positive workplace.

### **Code of Ethics and Conflict of Interest Policy**

#### **I. Personal and Professional Integrity**

All employees, board members, and volunteers of Challenge Unlimited, Inc. are expected to uphold the highest standards of integrity, honesty, and ethical conduct. Each individual must adhere to this Code of Ethics and Conflict of Interest Policy (the “Policy”) in all professional activities and interactions on behalf of the organization.

This Policy is distributed:

1. At hire, election, or start of volunteer service; annually thereafter
2. All individuals must sign an acknowledgment confirming their agreement to comply with this Policy.

#### **II. Mission Statement**

Challenge Unlimited, Inc. is a nonprofit organization with a mission to:

*To provide life changing equine assisted services, that foster the human horse connection to help individuals and families with physical, cognitive and emotional challenges experience healing and joy while living their full potential.*

*We strive to provide a robust set of programs designed to meet the needs of our disability and mental health communities through an experienced and professional staff, enthusiastic and effective volunteers, efficient and effective horse management and care with high-quality facilities*

*All operations, services, and strategic goals must support this mission and respond to the needs of the individuals and families served.*

### **III. Governance**

Challenge Unlimited, Inc. is governed by a Board of Directors, which is responsible for:

1. Defining and preserving the mission
2. Ensuring organizational and financial oversight
3. Upholding accountability and transparency

The Board must:

1. Possess the necessary expertise and skills to guide the organization
2. Avoid or properly manage conflicts of interest
3. Conduct performance reviews of the Executive Director and other senior staff
4. Promote inclusive, non-discriminatory policies across all employment and volunteer practices (in compliance with M.G.L. c.151B and federal equal opportunity laws)
5. Foster respectful, honest, and fair working relationships
6. Maintain fiscal responsibility and long-term sustainability

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### **IV. Legal Compliance**

Challenge Unlimited, Inc. complies with all applicable local, state, and federal laws, including:

1. Massachusetts Nonprofit Corporation Law (M.G.L. Chapter 180)
2. Internal Revenue Code requirements for 501(c)(3) organizations
3. Civil Rights and Employment laws

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### **V. Responsible Stewardship**

Challenge Unlimited, Inc. ensures that its financial and human resources are used appropriately and prudently, including:

1. Allocating a substantial portion of the budget toward program services
2. Maintaining reasonable administrative and fundraising costs

3. Ensuring compensation practices align with nonprofit benchmarks
4. Refraining from excessive accumulation of operating funds
5. Drawing from endowments only as needed and in accordance with donor intent

## **VI. Openness and Disclosure**

The organization is committed to transparency and will:

1. Provide public access to important records such as IRS Form 990 and audited financial statements
  2. Respond to reasonable requests for information
  3. Ensure solicitation materials accurately represent the organization's mission and activities
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## **VII. Program Evaluation**

To ensure effectiveness and improvement, all programs are:

1. Regularly reviewed and assessed
  2. Updated or restructured to better serve the needs of participants
  3. Monitored for compliance with stated goals and outcomes
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## **VIII. Fundraising Integrity**

Challenge Unlimited, Inc. conducts ethical fundraising in accordance with IRS and donor rights standards. Donors have the right to:

1. Be informed about the mission and use of donations
  2. Receive appropriate acknowledgment and transparency
  3. Have personal information handled with confidentiality (subject to M.G.L. Chapter 93H & I)
  4. Request removal from mailing lists
  5. Expect professionalism from all representatives of the organization
- 

## **Conflict of Interest Policy**

To preserve public trust and organizational integrity, Challenge Unlimited, Inc. maintains strict procedures to identify and address actual, potential, or perceived conflicts of interest.

### **Definition**

A conflict of interest arises when an individual's personal, financial, or professional interests interfere—or appear to interfere—with their duty to act in the best interests of the organization.

### **Disclosure and Procedure**

1. Any person associated with the organization must promptly and fully disclose any conflict to the Executive Director or Board Chair.
2. The Board of Directors will evaluate the situation and determine the appropriate course of action.
3. Individuals involved in the conflict must recuse themselves from any related decisions or votes.
4. Actions taken and disclosures must be recorded in the meeting minutes.

### **Prohibited Conduct**

No employee, board member, or volunteer shall:

1. Accept gifts, loans, or favors over \$25 in value from current or prospective vendors or partners
2. Use organizational resources for personal gain
3. Disclose personal information or images of clients without explicit, written consent (per HIPAA and state confidentiality standards)

### **Questions and Reporting**

Questions regarding this policy should be directed to the Executive Director or the Chairperson of the Board.

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## **Comprehensive Written Information Security Plan (WISP)**

(Per 201 CMR 17.00 – Massachusetts Data Protection Regulations)

### **I. Objective**

To implement administrative, technical, and physical safeguards to protect the personal information of Massachusetts residents, as required by M.G.L. Chapter 93H and 201 CMR 17.00.

## II. Definition of Personal Information

Information that includes a Massachusetts resident's:

1. First and last name (or first initial and last name) in combination with:
  - Social Security Number
  - Driver's license or state-issued ID number
  - Financial account number (including credit/debit card details with security credentials)

This excludes data lawfully available in public records.

## III. Purpose of the WISP

1. Safeguard the confidentiality and integrity of personal information
  2. Prevent unauthorized access or use
  3. Minimize the risk of identity theft or fraud
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## V. Scope and Implementation

The plan will:

1. Identify internal and external security risks
  2. Evaluate current systems and procedures
  3. Implement safeguards that are compliant with 201 CMR 17.00
  4. Monitor and test security effectiveness regularly
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## V. Data Security Coordinator

Human Resources is designated as the Data Security Coordinator and is responsible for:

1. Training staff on security protocols
2. Reviewing third-party vendors' data protection compliance
3. Supervising security audits and annual updates to the plan
4. Ensuring documentation of employee training and policy acknowledgment

## VI. Internal and External Risk Management

### Internal Protections

1. Access to personal data limited to authorized personnel
2. Locked storage for physical records
3. Strong passwords and re-authentication protocols
4. Immediate revocation of access for terminated staff
5. Employee contracts include non-disclosure obligations
6. Employees may not leave personal data visible or unattended

## **External Protections**

1. Use of updated firewalls, antivirus, and encryption software
2. Secure transmission of data over public networks
3. Monitoring systems for unauthorized access
4. Personal data on laptops or portable media must be encrypted

## **V. Internal Risks**

To reduce internal risks to the security, confidentiality, and integrity of records containing personal information, Ironstone Farm implements the following mandatory safeguards, in compliance with 201 CMR 17.00 (Massachusetts Data Security Regulations). These measures are effective immediately and were required to be fully implemented by March 1, 2019.

### **Required Internal Security Measures**

1. A copy of the Written Information Security Plan (WISP) must be provided to every employee. Each employee must acknowledge receipt in writing.
2. Employees must be retrained on the provisions of the WISP.
3. Employment contracts must require compliance with this Plan and prohibit any misuse of personal information during or after employment. Violations will result in mandatory disciplinary actions based on the nature of the incident.
4. Personal information collection is limited to what is reasonably necessary for legitimate business purposes or compliance with law.
5. Access to personal information is restricted to individuals with a documented need to know.
6. Systems must block user access after multiple failed login attempts.
7. The Data Security Coordinator is responsible for conducting an annual review of security measures or whenever significant business changes occur.
8. Upon termination, employees must return all records containing personal information and surrender all access credentials, including keys, IDs, and passwords.
9. Access for terminated employees must be immediately deactivated.
10. Passwords and user IDs must be changed periodically.
11. Only active users with active accounts may access personal information.
12. Employees are encouraged to report suspicious or unauthorized access immediately.

13. Any incident requiring notification under M.G.L. c. 93H, §3 will trigger a mandatory post-incident review to evaluate improvements to security protocols.
14. Employees are prohibited from leaving personal information visible on desks when unattended.

### **Physical Security and Storage**

1. At the end of the workday, records containing personal information must be securely stored in compliance with WISP standards.
  2. Each department must adopt physical access control policies and store data in locked areas or containers.
  3. Access to electronically stored information must be limited to users with unique login credentials. Computers must auto-lock after inactivity.
  4. Visitors must use a single designated entry, present photo ID, sign in, and wear a "GUEST" badge. They must be escorted in any area containing personal information.
  5. Paper or electronic records must be disposed of securely in compliance with M.G.L. c. 93I.
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## **VI. External Risks**

To mitigate external risks to the security, confidentiality, and integrity of personal information, the following controls are mandatory and became effective as of March 1, 2010, per 201 CMR 17.00.

### **Required Technical Safeguards**

1. Systems processing personal information must be protected by current firewall technologies and updated operating system security patches.
2. All such systems must use up-to-date antivirus and malware protection software with current patches and virus definitions.
3. Laptops or portable devices storing personal data must be encrypted, along with all data transmitted wirelessly or over public networks.
4. Encryption must meet standards defined by the Office of Consumer Affairs and Business Regulation, using secure algorithms and access keys.
5. Computer systems must be continuously monitored for unauthorized access or data use.

### **Secure Access Protocols**

1. Authentication protocols must include:
  - Control over user IDs and identifiers.



- Secure password assignment methods or use of biometric/token-based access.
  - Protection of passwords in secure formats or locations.
  - Limiting access to active accounts only.
  - Blocking access after repeated failed login attempts.
2. Secure access controls must require:
- Assignment of unique IDs and passwords to all personnel.
  - Elimination of vendor-supplied default passwords.

These security measures are essential to maintaining compliance with Massachusetts and federal data privacy laws, and they support Ironstone Farm's commitment to safeguarding all personal information under its care.

### **Whistleblower Policy**

Ironstone Therapy and Challenge Unlimited, Inc. are committed to maintaining the highest standards of ethical conduct and legal compliance. This Whistleblower Policy is intended to encourage employees to report suspected illegal, dishonest, or unethical conduct in a safe and secure manner, without fear of retaliation.

### **Definition and Scope**

A whistleblower, as defined by this policy, is any employee of Challenge Unlimited, Inc. or Ironstone Therapy who, in good faith, reports conduct or activities that they reasonably believe to be:

1. Illegal under federal, state, or local law.
2. Fraudulent financial reporting or business practices (e.g., billing for services not performed or goods not delivered); or
3. Dishonest, unethical, or in violation of company policies or procedures.

The whistleblower is not responsible for investigating the activity or determining fault. Responsibility for investigating and taking corrective action lies with appropriate management officials.

### **Reporting Process**

Employees who have knowledge of, or concerns regarding, potential misconduct are encouraged to report the issue as soon as possible. Reports may be made to:

1. The employee's immediate supervisor, or
2. The Director of Human Resources.

Employees should exercise sound judgment and avoid knowingly filing false or baseless claims. Anyone who intentionally files a false report will be subject to disciplinary action, up to and including termination.

### **Protection from Retaliation**

In accordance with the Massachusetts Whistleblower Protection Act (M.G.L. c. 149, §185) and relevant federal statutes including the Sarbanes-Oxley Act and the Defend Trade Secrets Act (DTSA), Ironstone and Challenge Unlimited strictly prohibit any form of retaliation against an employee who, in good faith, reports suspected wrongdoing.

Retaliation may include, but is not limited to:

- Termination or demotion
- Reduction in compensation or hours
- Unfavorable work assignments
- Threats, harassment, or intimidation

Any whistleblower who believes they have been subjected to retaliation must report it immediately to the Director of Human Resources. Retaliation will result in disciplinary action against the offender, up to and including termination.

**Note:** These protections do not shield an individual from disciplinary action for their own misconduct, if applicable.

### **Confidentiality**

To the extent possible, Ironstone Farm will protect the identity of the whistleblower. However, confidentiality may need to be waived:

1. To conduct a thorough investigation.
2. To comply with legal requirements; or
3. To afford the accused party their legal right to respond.

All reports will be handled with discretion and sensitivity.

### **Defend Trade Secrets Act (DTSA) Compliance Notice**

In compliance with the Defend Trade Secrets Act of 2016, employees are hereby notified of the following:

Immunity for Confidential Disclosure: An individual shall not be held criminally or civilly liable under any federal or state trade secret law for disclosing a trade secret if the disclosure is made:

- In confidence to a federal, state, or local government official or to an attorney, solely for the purpose of reporting or investigating a suspected legal violation;
- In a complaint or other legal document filed under seal in a lawsuit or other proceeding.

Use in Anti-Retaliation Lawsuits: An individual who files a lawsuit for retaliation for reporting a suspected violation of the law may disclose the trade secret to their attorney and use it in the proceeding if:

- The filing is made under seal, and
- The trade secret is not disclosed except by court order.

### **Follow-up and Accountability**

All reports will be promptly submitted to Human Resources, who is responsible for initiating and overseeing the investigation process. Corrective action will be taken when warranted.

Employees with any questions regarding this policy should contact Human Resources.

### **Employee Classification**

Ironstone Farm classifies employees based on the number of hours worked, the nature of the work relationship, and their eligibility for benefits. This classification determines the application of wage laws, benefits eligibility, and administrative processes. All employment at Ironstone Farm is at-will, meaning either the employee or Ironstone Farm may terminate the employment relationship at any time, with or without cause or notice. Employees are encouraged to provide a minimum of two (2) weeks' notice when resigning.

### **Trial Period for New Employees**

All new employees are hired on a three-month trial basis. During this time, performance, conduct, and overall fit within the organization will be evaluated. At the end of the trial period, the employee's supervisor will conduct a review to determine eligibility for continued employment as a regular employee.

### **Full-Time Employees**

1. Defined as employees scheduled to work 40 hours or more per week.
2. Classified as exempt salaried employees unless otherwise stated in writing.
3. Eligible for all company benefits, including:
  - Health insurance
  - Participation in the 403(b) retirement plan
  - Paid vacation and sick/personal time
  - Any other benefits provided to full-time staff

Exempt employees are not eligible for overtime pay under the Fair Labor Standards Act (FLSA), in accordance with federal and Massachusetts wage and hour laws.

### **Part-Time Employees**

1. Defined as employees scheduled to work up to 30 hours per week.
2. Classified as non-exempt hourly employees.
3. Required to submit accurate weekly timesheets for payroll processing.
1. Part-time employees scheduled to work 20 or more hours per week are eligible to participate in the company's 403(b) plan.
2. Eligibility for other benefits may vary based on hours worked and company policy.

### **Consultants and Contract Employees**

1. Hired on an as-needed basis for specific services or projects.
2. Treated as independent contractors and not considered employees of Ironstone Farm.
3. Responsible for submitting accurate invoices to receive payment.
4. No payroll deductions are made; contractors are responsible for paying their own:
  - Federal and state income taxes
  - Social Security and Medicare contributions
  - Any other applicable taxes

Contractors will not be paid retroactively if an invoice is not submitted during the designated pay period.

### **Compliance**

Ironstone Farm complies with all applicable federal and state employment classification laws, including:

1. The Fair Labor Standards Act (FLSA)
2. Massachusetts Wage Act (M.G.L. c. 149, §§ 148, 150)
3. IRS guidelines distinguishing employees from independent contractors

If you have any questions about your classification, status, or eligibility for benefits, please contact Human Resources.

### **CORI/SORI Policy**

(Criminal Offender Record Information & Sex Offender Registry Information)

Ironstone Farm, Challenge Unlimited, Inc., and Ironstone Therapy, Inc. are committed to ensuring the safety and well-being of our clients, staff, and community. In accordance with Massachusetts General Laws and Department of Criminal Justice Information Services (DCJIS) regulations, we conduct CORI and SORI background checks on employees, volunteers, and certain contractors whose duties may involve access to vulnerable populations, including children and individuals with disabilities.

### **Scope and Purpose**

This policy outlines procedures for the access, review, storage, and disposal of Criminal Offender Record Information (CORI) and Sex Offender Registry Information (SORI) and ensures compliance with applicable laws including:

1. M.G.L. c. 6, §§ 167–178B (CORI)
2. M.G.L. c. 6, §§ 178C–178P (SORI)
3. Executive Office of Health and Human Services regulations
4. DCJIS iCORI System Terms of Use

### **Authorization and Consent**

1. A CORI/SORI Acknowledgment and Authorization Form will be provided and must be completed upon hire.
2. No background check will be conducted without prior written authorization from the individual.

### **CORI/SORI Checks**

1. CORI and SORI checks will be conducted only when authorized by law and with the subject's written consent.
2. Individuals subject to a CORI or SORI check will be notified in advance.
3. Information will be obtained using the iCORI system provided by the DCJIS.

### **Verification and Use**

1. If a record is returned, the organization will compare it against information provided by the individual to verify identity.
2. A criminal record does not automatically disqualify an applicant or volunteer. Suitability is determined based on:
  - Relevance of the offense to the position
  - Nature and seriousness of the offense
  - Time since the offense
  - Age at the time of offense
  - Rehabilitation efforts and references
  - Any pending charges

3. Before making an adverse decision, individuals will be provided:
  - A copy of the CORI/SORI report
  - A copy of this policy
  - An opportunity to challenge the accuracy or relevance of the information

### **Storage and Access**

1. CORI/SORI information will be kept confidential and stored in a locked, secure location separate from personnel files.
2. Access is strictly limited to trained and authorized staff.
3. CORI/SORI information will not be shared or disseminated except as permitted by law.

### **Retention and Destruction**

1. CORI/SORI results will be retained for no more than 7 years or the duration of employment/volunteer service, whichever is shorter.
2. When no longer needed, information will be securely destroyed (shredded or electronically wiped in compliance with M.G.L. c. 93I).

### **Appeals and Corrections**

1. If the applicant disputes the findings, they may request a review or correction through the DCJIS following their standard procedures.
2. Applicants will be given DCJIS's "Information Concerning the Process for Correcting a Criminal Record" document upon request or if action may be taken based on CORI/SORI.

### **Non-Discrimination**

Ironstone Farm complies with federal and Massachusetts non-discrimination laws. Use of CORI/SORI information will be fair, impartial, and relevant to the applicant's potential responsibilities.

### **Pregnant Workers Fairness Policy**

Ironstone Farm is committed to supporting the health, safety, and economic security of pregnant employees and applicants. In alignment with both federal and state law, we ensure that no individual is denied employment opportunities, forced to take leave unnecessarily, or penalized due to pregnancy, childbirth, lactation, or related medical conditions.

This policy is implemented in compliance with the following laws:

1. Massachusetts Pregnant Workers Fairness Act (M.G.L. c.151B, §4)

2. Federal Pregnant Workers Fairness Act (PWFA), effective June 27, 2023
3. Title VII of the Civil Rights Act of 1964, as amended by the Pregnancy Discrimination Act
4. Americans with Disabilities Act (ADA), when applicable

### **Applicability**

This policy applies to all employees and applicants for employment with Ironstone Farm, regardless of length of service or position.

### **Protected Conditions**

Employees and applicants are protected from discrimination and are entitled to reasonable accommodations due to:

- Pregnancy
- Childbirth
- Lactation (breastfeeding or expressing milk)
- Any physical or mental condition related to pregnancy or childbirth

### **Employee Rights and Protections**

Under applicable law and this policy:

- Reasonable accommodation must be provided unless doing so causes an undue hardship to the organization.
- Employees cannot be denied employment opportunities due to a need for accommodation.
- Employees may not be forced to take leave if another reasonable accommodation is available.
- Employees cannot be required to accept accommodation they do not want, unless necessary to perform essential job functions.
- Employees are protected from retaliation for requesting, using, or supporting accommodations related to pregnancy or childbirth.

### **Examples of Reasonable Accommodations**

Reasonable accommodation may include, but are not limited to:

- Additional, longer, or more frequent breaks
- Modified work schedules
- Temporary transfer to a less strenuous or hazardous position
- Modified equipment, workstations, or seating
- Private, non-bathroom lactation space

- Assistance with lifting or manual labor tasks
- Flexible scheduling for prenatal or postnatal medical appointments

### **How to Request an Accommodation**

Employees may request accommodations by contacting Human Resources.

Some accommodations—such as breaks or lactation space—may be provided without medical documentation. Others may require documentation from a licensed healthcare provider.

All accommodation requests will be addressed promptly, fairly, and confidentially in accordance with the law.

### **Confidentiality and Non-Retaliation**

Ironstone Farm strictly prohibits retaliation against any individual who:

1. Requests or uses an accommodation
2. Files a complaint
3. Assists in an investigation related to pregnancy or childbirth-related rights

All information shared in relation to accommodation requests will be kept confidential and shared only with those responsible for implementing the request or as otherwise required by law.

### **Reasonable Accommodation Policy**

Ironstone Farm is committed to complying fully with the Americans with Disabilities Act (ADA), the Massachusetts Fair Employment Practices Act (M.G.L. c. 151B), and all applicable federal and state laws concerning the employment of persons with disabilities.

Employees or applicants with a qualified disability may request a reasonable accommodation to perform the essential functions of their job or participate in the application process. Reasonable accommodations will be provided unless doing so would create an undue hardship on the operation of Ironstone Farm.

To request an accommodation, employees should notify their immediate supervisor, the Office Manager, or Human Resources. Requests will be reviewed on an individualized basis and may require supporting documentation from a healthcare provider.

Ironstone Farm prohibits retaliation against individuals for requesting accommodations.

### **Family and Medical Leave Policy (Voluntary)**



## **Purpose**

Although Ironstone Farm is not subject to the federal Family and Medical Leave Act (FMLA), we recognize the importance of supporting our employees during significant life events. This policy allows eligible employees to take unpaid leave for qualifying medical and family reasons, while maintaining job protection and continuity of benefits in line with our values of care, fairness, and respect.

## **Eligibility**

Employees are eligible for leave under this policy if they:

- Have been employed at Ironstone Farm for at least 12 months (need not be consecutive), **and**
- Have worked at least 1,000 hours in the 12 months immediately preceding the leave request.

## **Qualifying Reasons for Leave**

Eligible employees may take leave for the following reasons:

1. The birth, adoption, or placement of a child with the employee for foster care.
2. To care for a spouse, child, or parent with a serious health condition.
3. The employee's own serious health condition that renders them unable to perform essential job functions.
4. A qualifying exigency arising from a family member's military service.

## **Length of Leave**

- Up to 8 weeks of unpaid leave in a rolling 12-month period.
- Leave may be taken consecutively or intermittently, as medically necessary and approved.

## **Job Protection**

- Employees returning from approved leave will be reinstated to the same or an equivalent position, unless circumstances (e.g., position elimination) occurred regardless of the leave.
- Ironstone will make every reasonable effort to return the employee to their original position or one with equivalent pay, benefits, and responsibilities.

## **Use of Paid Leave**

- Employees are required to use any available paid time off (PTO) concurrently with this leave.
- Once paid leave is exhausted, the remainder of the leave will be unpaid.

## **Benefits During Leave**

- Health insurance (if applicable) will be maintained during the leave period, provided the employee continues to pay their portion of premiums.
- Failure to return to work after the leave may require the employee to reimburse the cost of health benefits paid by Ironstone during leave, unless the reason for non-return is due to continued serious health condition or other circumstances beyond the employee's control.

## **Leave Request Procedure**

- Employees must provide at least 30 days' advance written notice for foreseeable leave, or as soon as practicable in emergency situations.
- A medical certification may be required to support the need for leave due to a serious health condition.

## **Non-Retaliation**

Employees will not be retaliated against for requesting or taking leave under this policy.

## **I-9 and E-Verify Compliance Policy**

Ironstone Farm is committed to complying with all federal laws and regulations regarding employment eligibility verification. In accordance with the Immigration Reform and Control Act of 1986 (IRCA) and applicable federal regulations, all individuals employed by Ironstone Farm must be legally authorized to work in the United States.

## **Form I-9 Employment Eligibility Verification**

As required by U.S. Citizenship and Immigration Services (USCIS):

1. All new hires must complete Form I-9 no later than the third business day after their first day of employment.
2. Employees must provide original, unexpired documents that establish both identity and employment authorization. A list of acceptable documents can be found on the last page of Form I-9.
3. Ironstone Farm is required to examine the documentation in good faith and retain the completed I-9 form for all current employees, and for a specified period after termination, in compliance with federal retention rules.
4. Failure to complete the I-9 process within the required timeframe may result in suspension or termination of employment.

## **Anti-Discrimination and Privacy Protections**

Ironstone Farm complies with all federal anti-discrimination provisions under:

- The Immigration and Nationality Act (INA)
- The Civil Rights Act of 1964, and
- Other applicable laws

### **We do not:**

1. Use the Form I-9 or E-Verify process to pre-screen job applicants
2. Discriminate based on citizenship status or national origin

### **We do:**

1. Maintain strict confidentiality of employee documentation
2. Use collected data solely for lawful employment verification

## **Anti-Discrimination and Privacy Protections**

Ironstone Farm strictly adheres to the Immigration and Nationality Act (INA), Title VII of the Civil Rights Act of 1964, and all applicable federal and state laws prohibiting discrimination based on citizenship status or national origin in hiring, employment eligibility verification, and throughout the employment relationship.

## **Equal Opportunity and Fair Employment Practices**

Ironstone Farm does not use Form I-9 or E-Verify to pre-screen job applicants or to delay or deny employment based on an individual's national origin, citizenship status, or immigration status, except as required to comply with federal employment authorization laws.

We are committed to equal employment opportunities for all qualified individuals and prohibit any form of discrimination during the employment eligibility verification process.

## **Privacy and Confidentiality of Information**

All documents and information collected during the I-9 and E-Verify process are considered sensitive and confidential.

This information will be:

- Used solely for purposes of verifying employment eligibility as required by law.
- Stored securely and accessed only by authorized personnel.
- Retained and disposed of in accordance with federal data privacy and record retention guidelines.

## **Employee Rights**

Employees who believe they have been subject to discrimination related to their citizenship or immigration status have the right to:

1. File a complaint with the U.S. Department of Justice, Civil Rights Division, Immigrant and Employee Rights Section (IER).
2. Be protected from retaliation for reporting discrimination or participating in an investigation.

Ironstone Farm encourages any employee with concerns or questions about the employment verification process to contact Human Resources.

## **Surveillance and Camera Use Policy**

Ironstone Farm utilizes surveillance cameras with recording capabilities in designated areas of the property, including but not limited to horse paddocks, indoor riding arena, and outdoor riding spaces. These systems are essential to ensuring the safety and security of all individuals on the property, including employees, volunteers, clients, animals, and visitors.

### **Purpose**

The use of surveillance systems is intended to:

- Monitor safety and welfare of clients, animals, employees, and volunteers
- Deter theft, vandalism, or unsafe behavior
- Assist in the review of incidents, accidents, or injuries
- Support supervision, training, and quality assurance efforts

### **Camera Locations**

Cameras are positioned in clearly visible, public areas where there is no reasonable expectation of privacy, such as:

- Paddocks
- Indoor and outdoor riding arenas
- Barn exteriors and common areas
- Facility entrances and exits

Cameras are not installed in private spaces such as restrooms, locker rooms, or employee break areas.

### **Audio Recording Compliance**

Ironstone Farm complies with Massachusetts General Law c. 272, § 99, which prohibits the recording of conversations without the consent of all parties involved. Therefore, audio recording is not enabled on surveillance equipment unless legally permitted and all-party consent is obtained. At this time, all surveillance equipment in use is video-only.

**Notice and Consent**

Signage is posted in all areas where video surveillance is active. By entering Ironstone Farm property or participating in any program, both employees and volunteers acknowledge and provide consent to video monitoring in these designated areas.

All new volunteers will be notified of this policy during onboarding and will be required to sign an acknowledgment form indicating their understanding and agreement.

**Access to Recordings**

Access to surveillance recordings is restricted to authorized personnel, including management and the Executive Director. Recordings will be reviewed only as needed and retained for a limited duration unless required for ongoing investigations.

**Prohibited Use**

Surveillance footage may not be used for personal purposes, distributed to unauthorized individuals, or disclosed publicly without written approval from the Executive Director. Misuse of camera footage by any staff member or volunteer may result in disciplinary action, up to and including termination of employment or volunteer service.

**Annual Review of Handbook Policies**

To ensure ongoing compliance with applicable laws and organizational practices, Ironstone Farm will review this Employee Policy Handbook on an annual basis.

Revisions may be made as necessary to reflect changes in state and federal law, organizational structure, or operational practices. Employees will be notified of any material changes and may be asked to review and re-acknowledge their understanding of updated policies.