



CircleUp Education's Participant Anti-Discrimination Service Policy

Legal DEI in Action: CircleUp Education's Anti-Discrimination Service Policy and Discrimination Reporting Tool

Updated January 31st, 2025

Legal DEI in Action

1. Policy Statement

CircleUp Education is dedicated to maintaining an inclusive, equitable, and respectful learning environment for all participants of our training and consulting services. This Anti-Discrimination Service Policy applies to all participants, trainers, developers, planners, administrators, and staff involved in our programs, across all delivery formats, including in-person, online (synchronous or asynchronous), and blended learning environments.

This policy is designed to transparently communicate our strong effort to interrupt systems, behaviors, and actions that perpetuate unlawful discrimination and to create safe, courageous, shame-free, harassment-free learning environments. Employees and participants in our services will have opportunities to learn about discrimination, develop tools to improve their anti-discrimination skills, and mindfully and respectfully interrupt discrimination when it appears within CircleUp Education or in our services.

If you have experienced discrimination, please report it immediately and confidentially by clicking on the **Report Discrimination** button. We thoroughly investigate all claims to ensure that our services



comply with local and federal laws and to create a lawful and equitable workplace for our employees, clients, and teams. We recognize that some topics are sensitive and difficult to discuss, but our team is highly skilled in facilitating respectful and profound conversations around these challenging subjects.

This policy is in compliance with the Civil Rights Act of 1964 and the California Fair Employment and Housing Act (FEHA), which prohibit discrimination based on race, color, religion, sex, gender identity, gender expression, sexual orientation, national origin, disability, age, and other protected characteristics. Discrimination based on sex includes gender identity and gender expression, as determined by **California law and the Supreme Court case Bostock v. Clayton County (2020)**, which held that discrimination based on sexual orientation and gender identity is a form of sex discrimination under **Title VII of the Civil Rights Act**. Until this ruling is overturned or challenged, it remains in effect as binding law.

2. Definitions

Discrimination: Discrimination occurs when individuals are treated unfairly or unequally based on legally protected characteristics, including but not limited to race, color, religion, sex (including gender identity and gender expression), sexual orientation, national origin, disability, age, marital status, and veteran status. Discrimination can occur in hiring, training, promotion, termination, compensation, and access to educational or professional opportunities. Both the **Civil Rights Act of 1964** and **California's Fair Employment and Housing Act (FEHA)** provide extensive protections against discrimination in the workplace and public accommodations.

Explicit Discrimination: Overt actions, statements, or behaviors that directly discriminate against individuals based on legally protected characteristics. Examples include derogatory comments, exclusion from activities, or denial of opportunities.

Implicit Discrimination: Subtle, often unconscious biases that can lead to discriminatory actions or attitudes. This includes microaggressions, biased assumptions, or unequal treatment that is not overt but still harmful.

Microaggressions: A form of verbal or non-verbal discrimination that stems from unconscious associations between a person's social identity and biased perceptions. Microaggressions, though subtle, can cause significant harm and are considered a form of implicit discrimination.

3. Prohibited Actions



Discrimination can manifest in various ways across different platforms, and all forms are strictly prohibited.

4. Reporting and Addressing Discrimination

Participants who experience or witness any form of discrimination are encouraged to report it immediately. Reports can be submitted confidentially using the **Report Discrimination** button. CircleUp Education is committed to addressing all reports promptly and thoroughly.

5. Discrimination at CircleUp Education

CircleUp Education is an equal opportunity employer and does not unlawfully discriminate against employees or applicants for employment based on legally protected characteristics. This policy extends to all terms, conditions, and privileges of employment.

Microaggressions & Implicit Bias: CircleUp Education recognizes that implicit forms of discrimination, such as microaggressions, can be just as harmful as explicit forms. Employees receive training on implicit bias, microaggressions, and strategies for identifying and interrupting these behaviors.

Conscious Conversations: To address instances of implicit bias or microaggressions, CircleUp Education encourages the use of Conscious Conversations. These are structured discussions aimed at raising awareness and addressing unconscious or conscious forms of discrimination.

Institutionalized Discrimination: CircleUp Education prohibits the creation and maintenance of policies, practices, or procedures that perpetuate discrimination. Any employee who identifies institutionalized discrimination is required to report it immediately.

Liability for Unlawful Discrimination: Employees or volunteers found to have engaged in unlawful implicit or explicit discrimination are subject to disciplinary action.

6. Implicit Bias and Discrimination Training

CircleUp Education requires all employees to undergo mandatory in-house training on implicit bias and discrimination. This training aligns with the Civil Rights Act of 1964 and California state laws ensuring compliance with workplace anti-discrimination regulations.



7. Mandatory Training for New Employees

To ensure that all employees are well-equipped to support our commitment to diversity and inclusion, the following training programs are mandatory:

- **Diversity Uncovered:** A foundational course on explicit and implicit bias and strategies for interrupting such behaviors.
- **Cultural Competency Uncovered Series:**
 - **Accessible Language in Action:** Learning about barriers to communication and language and how to build awareness to remove them.
 - **Unraveling Cultural Threads:** A look at what culture is and identifying cultural threads or characteristics that exist in our workplace and communities that experience our trainings and services to prevent stereotypes and biases about them.
 - **Cultural Competency Conversations:** How to have conversations about questionable cultural norms, behaviors, or actions that could be discriminatory or violate state and federal laws and protections.
 - **Cultural Competency in Action:** How to use simple and effective tools to learn more about different cultures to prevent unintentional discrimination from happening and enhance service.
- **Racism Uncovered:** A training that teaches the difference between discrimination based on race and racism, and how historical, systemic, and institutional structures add complex layers to racism that impact employees and participants in trainings.
- **Dissonance Responses to Racism & Power Dynamics Training:** Learn about responses that people have when they are well-intentioned yet unaware of implicit discrimination, and how these responses can contribute to implicit discrimination or racism.
- **Understanding Privilege and Power Systems:** A facilitated group discussion on the dynamics of privilege, power, and discrimination.

Completion of these courses is a condition of employment, and non-compliance may result in disciplinary action.

8. Acknowledgment

All trainers and staff at CircleUp Education are required to sign an acknowledgment form confirming their understanding of and commitment to this policy. Non-compliance may result in disciplinary action.



<https://www.research.net/r/P6QSCM6>

Visit - <https://circleuped.org/discriminationpolicy> for the policy on our website.