

WAYNE COUNTY ACTION PROGRAM, INC. Policies & Procedures

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| <b>Policy Number:</b><br>F1.A                     | <b>Effective Date:</b><br>09/26/13  | <b>Page:</b><br>1 of 2                  |
| <b>Proposed Effective Date:</b><br>09/26/13       | <b>Relevant Regulation Name &amp; Number:</b><br>Civil Rights Act of 1964, Title VII; Equal Pay Act of 1963; Executive Order 11246, as amended by Executive Order 11375; American with Disabilities Act of 1990 | <b>Draft Number:</b><br>1               |
| <b>Policy Council Approval Date:</b><br>9-12-2013 |   | <b>Board Approval Date:</b><br>09/26/13 |

**SUBJECT: *Diversity Policy***

**PERFORMANCE OBJECTIVE:** Wayne County Action Program (the Agency) is committed to diversification of all its internal divisions by race and gender. This commitment stems not only from legal and moral considerations, but also from a conviction that an agency dedicated to empowering self-sufficiency for all individuals is enriched by the presence of diversity and that narrow cultural biases serve to limit rather than enhance our mission – *coordinating resources to empower and inspire people in need to reach their full potential.*

**POLICY:** The policy of this Agency is to ensure that no person will encounter discrimination in employment or services on the basis of age, color, disability, sex, national origin, race, religion, sexual orientation, or veteran status. This policy is applicable to both the employment practices and administration of programs and activities within the Agency. It is the policy of the Agency that no person shall be excluded from the participation in, be denied the benefits of, or in any way be subject to discrimination in any program or activity associated with Wayne County Action Program, Inc.

**OPERATIONAL PROCEDURE:**

1. It is Wayne CAP's obligation to fully participate in this Diversity Policy implementation and in the implementation of full compliance of all applicable federal, state, and local laws dealing with nondiscrimination.
2. Compliance with this policy is the responsibility of all Administrators, Directors and others whose duties are related to any personnel decisions regarding employees and/or individuals accessing services through the Agency.
3. It is the mission of Senior Management and the Human Resource Department to eliminate discrimination in the workplace through:
  - a) the promotion of equal opportunity in employment through compliance with federal, state, and local civil rights employment laws,

- b) staff education and outreach, and
- c) the fair and voluntary resolution of disputes.

Established procedures are in place which allows complaints of alleged discrimination to be investigated and resolved. Any questions or concerns may be addressed using the following Complaint Procedure:

1. Individual will be asked to complete an in-take form which will include a description of the alleged discrimination and the nature of the remedy desired.
2. A private interview will be conducted by the CEO/COO with the complainant.
3. The COO will notify and interview the person(s) named in the complaint (respondent) to apprise them of the charges and afford them an opportunity to respond.
4. The investigation by the COO will include interviewing witnesses, collecting documentation, and seeking any additional information necessary.
5. The CEO/COO may assist in the informal resolution of the complaint. With the consent of both parties involved, the CEO/COO will arrange for information to be shared between the parties regarding applicable issues and appropriate remedies. Failure to reach a resolution will result in the continuation of the investigation.
6. The CEO will then determine whether there exists substantial evidence to support the alleged complaint.
7. A final written determination, setting forth the CEO's decision will be sent to both the complainant and the respondent.
8. If disciplinary action is required as a result of a finding against the respondent, they will be conducted with respect to the Employee Handbook Employee Discipline Policy.
9. A review of the final determination of the CEO will be presented to the Personnel Committee of the Board, which may recommend a presentation of the determination to the full Board of Directors.
10. Complainant has the right to file with the Equal Employment Commission (EEOC) at any time during an investigation. Be aware that the EEOC has time limitations for filing a charge of discrimination.
11. Any retaliatory action taken by a Wayne CAP employee against a complaining party as a result of seeking relief under these procedures is strictly prohibited and will be cause for immediate dismissal.