



WORKFORCE DIVERSITY PROGRAM

The LOTT Alliance Diversity Program was developed by the following team:

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Approved by:

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Michael D. Strub, P.E.
Executive Director

February 17, 2009

Date

LOTT Alliance Workforce Diversity Program

Introduction

The Workforce Diversity Program was developed to clearly state LOTT's values, vision, objectives, and strategy to create a diverse, productive workforce and an inclusive work environment. The LOTT Alliance is, and will continue to be, an Equal Opportunity Employer. We are committed to creating a workplace that is free of discrimination in any form and is welcoming to all employees and visitors. We will hire the best person for each LOTT position, regardless of individual characteristics not directly job-related. People interested in working for the LOTT Alliance are encouraged to submit an application for any open position for which they are able to perform the essential functions and meet the posted job qualifications.

LOTT Alliance Administrative Guidelines related to this program may be found in the Appendices.

Diversity Defined

For the purpose of this program, diversity is defined as:

The variety of dynamic visible and invisible characteristics, beliefs, and life experiences that make people unique individuals.

Values

At the LOTT Alliance, employment decisions are based only on bona fide job-related considerations. LOTT is committed to hiring the best person for each job and to fostering an environment where everyone, including coworkers and visitors, are treated with respect and feel accepted and welcome regardless of:

- Color, race, or ethnicity;
- Religion, sect, spiritual practices, or lack thereof;
- National origin or nationality;
- Age;
- Sex (male/female), gender (masculine/feminine), or sexual orientation;
- Marital or family status;
- Physical ability, including actual or perceived disability;
- Military or veteran status;
- Political affiliation;
- Physical attributes (for example height, weight, etc.);
- Socio-economic background; and
- Educational level.

The LOTT Alliance values its workforce as essential to the success of its mission. Industry publications have identified staffing as a major area of concern for the future of American utilities as a result of significant demographic shifts. Recent changes to the American workforce include a projected shortage of available skilled workers, due in part to the impending retirement of the baby-boom generation and the smaller size of subsequent generations. The American workforce is also becoming increasingly diverse across multiple dimensions, including sex, culture, language, disability, and age. We recognize that a workplace climate of inclusion, which goes above and beyond legal compliance, is critical to the utility's ability to attract and retain the best employees within our workforce. We are committed to fostering an environment that is open and accepting of America's evolving and diverse workforce to ensure that LOTT is able to attract the people and talent needed to meet the utility's future challenges.

The LOTT Alliance is committed to creating an environment that accepts, welcomes, and is comfortable to and supportive of people with diverse characteristics, backgrounds, needs, ideas, and values. We believe that diversity enhances our workplace and enriches our lives. We value the variety of life experiences, beliefs, skills, and other characteristics of our employees that infuse our workplace with diverse opinions, ideas, and energies. We are committed to treating each other with respect and valuing each person as an individual. We recognize that each of us has characteristics that allow us to contribute to the success of the utility in our unique ways. We believe that people should be valued irrespective of their differences, and that these differences can be channeled to create a productive, innovative, and inspiring work environment.

Vision

The LOTT Alliance fosters a workplace climate that accepts, supports, and values diversity. This is demonstrated through our inclusive organizational culture that is welcoming and comfortable for employees and visitors with diverse characteristics, beliefs, and life experiences.

Objectives

The following objectives were identified to provide attainable, measurable goals that, when achieved, will help the LOTT Alliance realize its diversity vision.

- 1) Improve or maintain workforce diversity by increasing the diversity of the applicant pool during job recruitment processes;
- 2) Manage each employee selection process to ensure that LOTT hires the best person for the job and that hiring decisions are made based only on bona fide job-related considerations; and
- 3) Create and maintain an inclusive work environment that supports the success of a diverse employee population.

Strategies

This plan identifies numerous strategies that the LOTT Alliance will use to achieve each objective specified above.

Improve or maintain workforce diversity by increasing the diversity of the applicant pool during job recruitment processes.

Objective 1 Strategies

1. Review every job opening as an opportunity to expand the diversity of LOTT's workforce, and when feasible, create entry-level job opportunities and hire for aptitude and attitude rather than experience. This will allow LOTT access to an applicant pool which is more diverse than the industry average.
2. Advertise positions in a variety of larger urban newspapers (such as the Seattle Times, Seattle Post Intelligencer, and Tacoma News Tribune) and industry-specific publications that may serve underrepresented groups. This will likely provide access to an applicant pool that is more diverse than our surrounding community.
3. Seek ongoing opportunities for outreach to a diverse labor pool, including participation in job fairs associated with high schools, colleges, and universities; conducting active recruitment efforts at industry-related conferences; and developing contacts and partnerships with trade, minority, and diverse organizations.
4. When appropriate, use direct mailings to attract qualified applicants from areas outside of our immediate community.
5. Post job openings to local colleges and employment centers.
6. Explore the use of internships, work study, and summer hire programs to create an interest in LOTT and employment in the wastewater industry with individuals entering the labor market.
7. Deliberately time entry-level openings and apprenticeship recruitments to coincide with high school and college graduations.
8. Include a voluntary form seeking federal EEO information with LOTT's official application which will allow LOTT to track sourcing and yields to better target future recruitments to attract a diverse pool of applicants.
9. Include the statement "*The LOTT Alliance is an Equal Opportunity Employer*" on all job postings and application forms.

Manage each employee selection process to ensure that LOTT hires the best person for the job and hiring decisions are made based only on bona fide job-related considerations.

Objective 2 Strategies

1. Ensure that a diverse group of screeners and interviewers participate in each selection process. Panels should include at least one individual from an underrepresented group and should include diverse perspectives and characteristics, such as:
 - Sex
 - Age
 - LOTT tenure
 - Ethnicity
 - Union/non-union
 - Assigned work team
 - Supervisor/front-line employee
2. Develop and implement a recruitment orientation process and provide Human Resources assistance for supervisors prior to conducting job recruitments. Orientation will include information on:
 - Using the Hiring Request Form as a tool to design, manage, and document the hiring process.
 - Designing and managing an interview process to ensure that:
 - Objective, job-related criteria are used for selection.
 - Candidates have an equal opportunity to excel and that they all are provided a consistent interview experience.
 - Selection of the interview panel (to include subject matter experts and diverse attributes listed above in strategy 1).
 - Selection and interview techniques (supplemental questionnaires, homework assignments, role-playing; behaviorally-based interview questions).
 - Interview process consensus scoring and what to do if consensus cannot be reached following the initial interview process.
 - Conducting thorough reference checks.
3. Develop and implement a selection process checklist to be reviewed by screeners and interviewers prior to each selection process. The checklist will include:
 - Understanding the duties and requirements of the position being filled;
 - Sources and types of potential bias;
 - Importance of documenting the process; and
 - A reminder of off-limits questions for members of the interview panel.

Create and maintain an inclusive workplace that supports the success of a diverse employee population.

Objective 3 Strategies

1. Develop a comprehensive orientation process for new employees to ensure that all new hires feel welcome and supported and that they clearly understand what is expected of them on the job.
2. Annually evaluate LOTT's benefits package and adjust as needed to ensure that our benefits continue to meet the needs of a diverse workforce.
3. Provide regular Harassment Prevention and Diversity Awareness training for all staff.
4. Reinforce the message that LOTT will not tolerate any expression or exercising of prejudices and other biases in the workplace.
5. The management team confronts inappropriate behaviors and prejudicial comments when observed or reported.
6. LOTT encourages an inclusive work environment and fosters support for diversity within our workforce and community by hosting events and publishing newsletter articles that highlight and celebrate diversity.
7. LOTT actively and visibly supports diversity by purchasing, distributing, and/or displaying materials, articles, and/or posters highlighting diversity-related topics and allows use of our monthly newsletter and Sharepoint site to reinforce this message.
8. When creating materials for publication which include staff, Board, and citizen photos, LOTT staff will select photos which highlight the diversity of our workforce and community and help create a sense of inclusion.
9. LOTT encourages staff participation in community events and organizations that serve and support diversity and diverse populations by allowing employees to use their Community Service Day for these activities.

Measures

LOTT's progress toward achievement of the objectives identified in this program will be documented using the following measures which will be reported annually.

1. Report and track the number of entry level jobs opened versus total vacancies filled.
2. Provide annual Harassment Prevention and Diversity Awareness Training for 100% of LOTT staff.
3. Provide Harassment Prevention Training for new employees within 2 months of their date of hire.
4. Ensure that new employees receive a comprehensive orientation, including an initial Performance and Development Planning Process with their supervisor in which performance expectations are clearly expressed and documented.
5. Include questions relating to an inclusive, respectful work environment in any climate or workplace satisfaction survey that is conducted and track results over time.

Roles and Responsibilities



All Employees: are responsible for contributing to the creation of an inclusive and welcoming environment; for reporting suspected incidents of behavior contrary to this program; and for treating all coworkers, Board members, and visitors of the LOTT Alliance with respect and dignity.

Management Team (supervisors, managers, and directors): members are responsible for reminding assigned employees of this program; for encouraging employees to address and report behaviors contrary to this program; for responding to such incidents and reports; for designing and managing recruitment and selection processes to comply with this program; for conducting new employee orientations; and for being a role model for LOTT's efforts to create a diverse, inclusive, and welcoming environment.

Human Resources: is responsible for ensuring that all employees are provided a copy of this document; for coordinating annual training identified in this program; for developing and implementing LOTT's New Employee Orientation and Recruitment Process Orientation; for designing and implementing the Selection Process Checklist; for assisting and advising employees and management on the administration of this program; for supporting LOTT's Equal Employment Opportunity efforts; and for monitoring implementation of this program, including reporting the measures identified herein.

Executive Director: is responsible for delegating administration and enforcement of this program.

Appendix A

		ADMINISTRATIVE GUIDELINE 1 EQUAL EMPLOYMENT OPPORTUNITY/ WORKFORCE DIVERSITY	
Prepared By: Human Resources		Approved By: 	
Effective Date: March 13, 2007		Michael D. Strub, P.E. Executive Director	

- SECTION INDEX:**
- 1.1 Purpose
 - 1.2 Reference
 - 1.3 Application
 - 1.4 Policy
 - 1.5 Workforce Diversity Program

1.1 **PURPOSE**

To state the LOTT Alliance policy regarding equal employment opportunity and establish authority for creating a Workforce Diversity Program.

1.2 **REFERENCE**

Title VII of the Civil Rights Act of 1964 as amended; Civil Rights Act of 1991; Age Discrimination in Employment Act; EOC Sexual Harassment Guidelines; Americans with Disabilities Act; See also LOTT Alliance Administrative Guideline Chapter 2, Americans with Disabilities Act/Reasonable Accommodation.

1.3 **APPLICATION**

The Administrative Guideline applies to all individuals employed by the Alliance.



1.4 **POLICY**

Discrimination against any individual in regard to hiring, promotion, discipline or other employment practices because of age, sex, race, creed, color, national origin, sexual orientation or the presence of any physical, mental, or sensory disability is prohibited.

1.5 **WORKFORCE DIVERSITY PROGRAM**

Human Resources is responsible for the development and execution of a Workforce Diversity Program. When established, the Workforce Diversity Program shall provide affirmative procedures, which ensure equality in employment and contribute to achieving and maintaining a workforce which reflects the diversity of our community, to the extent allowed by law.

Appendix B

		ADMINISTRATIVE GUIDELINE 2 AMERICANS WITH DISABILITIES ACT (ADA)/ REASONABLE ACCOMMODATION	
Prepared By: Human Resources		Approved By: 	
Effective Date: March 13, 2007		Michael D. Strub, P.E. Executive Director	

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	2.5.5	Undue Hardship/Direct Threat
	2.6	Grievance Procedure

2.1 **PURPOSE**

To establish a policy and guidelines for accommodating persons with disabilities in employment practices in compliance with the Americans with Disabilities Act.

2.2 **REFERENCE**

Americans with Disabilities Act (ADA). Equal Employment Opportunity Commission (EEOC) ADA Guidelines. See also LOTT Alliance Administrative Guideline 18, Limited Duty Assignments – Pregnancy; 19 – Return to Work; and Appendix 3 – ADA Grievance Procedure.

2.3 **APPLICATION**

The Administrative Guideline applies to all individuals employed by the LOTT Alliance and job applicants for positions with the LOTT Alliance.

2.4 **POLICY**

It is the policy of the LOTT Alliance to comply with the Americans with Disabilities Act. The LOTT Alliance will not discriminate in the provision of employment services, nor in its employment practices to any applicant or employee. The LOTT Alliance will determine reasonable accommodation to provide employment services, employ, or continue the employment of a qualified individual with a disability, persons with a record of such an impairment, or persons regarded as having such an impairment.

Human Resources is responsible to provide for evaluation and determination of a qualified disability and reasonable accommodation on a case by case basis.

Consideration of or request for reasonable accommodation with respect to employment practices should be directed to Human Resources.

2.5 **GUIDELINES**

2.5.1 **Qualified Disability:** The ADA defines a disability as:

- A. A physical or mental impairment that substantially limits one or more major life activities;
- B. A record of such an impairment; or
- C. Being regarded as having such an impairment.

2.5.2 **Qualified Individual with a Disability:** The ADA defines a qualified individual with a disability as a person with a disability who satisfies the requisite skill, experience, education, and other job-related requirements of the employment position that such an individual holds or desires, and who, with or without reasonable accommodations, can perform the essential functions of the position.

2.5.3 **Reasonable Accommodation:**

- A. Reasonable accommodation is defined by the ADA as a modification or adjustment to a job, the work environment, or the way things are usually done that enables a qualified individual with a disability to enjoy an equal employment opportunity.
- B. It is the policy of the LOTT Alliance to determine accommodation and any related issues on a case by case basis. Reasonable accommodation will be determined through consideration of the essential functions of the job, financial feasibility, or any other matters affecting the LOTT Alliance.
- C. Reasonable accommodation will be considered only for job-related factors that assist the employee in performing the essential functions of the position and will not be considered for matters of personal benefit to the individual with disability.

2.5.4 **Current Employees:** For current employees who meet the ADA requirements for “qualified individual” and “qualified disability,” consideration will be given to the job assignments for purposes of reasonable accommodation as follows:

- A. Temporary reassignment to limited duties within the employee’s job classification.
- B. Temporary reassignment of the employee, at his/her current rate of pay, to another classification with equal or lower pay for which the employee is qualified.
- C. Job restructuring, where feasible, to provide the opportunity for continued employment to the disabled employee.
- D. Reassignment to a vacant position as a reasonable accommodation when accommodation within an employee’s current position is not feasible.
- E. Where possible, accommodation will be made that enables the disabled employee to remain in the current position.

2.5.5 **Undue Hardship/Direct Threat:** The LOTT Alliance will evaluate and determine whether a qualified disability exists and whether reasonable accommodation can be made for employment practices or positions. Should it be determined that an undue hardship exists to the LOTT Alliance or a direct threat to the health and safety of the employee or others exists, the LOTT Alliance may determine that a reasonable accommodation to perform the essential function of the position does not exist. The

evaluation of whether undue hardship or direct threat to the health or safety of the individual or others may be conducted for any employment practice or action will be conducted on a case by case basis, including examinations requiring physical agility or physical skills.

- 2.6 **Grievance Procedure:** Any member of the public, job applicant, or employee may request a hearing and investigation of a complaint regarding compliance with the ADA with respect to employment practices through the LOTT Alliance's established ADA Grievance Procedure.

The ADA Grievance Procedure may be found in the appendix of this guideline. Copies of the Grievance Procedure are also available to the public or LOTT Alliance employees from LOTT's General Counsel/Administrative Director or Human Resources.



ADA GRIEVANCE PROCEDURE

The LOTT Alliance has adopted a grievance procedure for prompt and equitable resolution of complaints alleging any action prohibited by the United States Department of Justice regulations implementing Title II of the Americans with Disabilities Act (ADA). Title II states, in part, that "no otherwise qualified disabled individual shall, solely by reason of such disability, be excluded from the participation in, be denied the benefits of, or be subjected to discrimination" in programs, services or activities sponsored by a public entity.

Complaints should be addressed to: LOTT Alliance Human Resources
111 Market Street, Suite 250
Olympia, WA 98501
(360) 528-5720

1. The complaint should be filed in writing, contain the name and address of the person filing it, and briefly describe the alleged violation of the regulations.
2. The complaint should be filed within 30 days after the complainant becomes aware of the alleged violation.
3. An investigation shall be conducted by Human Resources, as appropriate. These rules contemplate informal but thorough investigation, affording all interested persons and their representatives, if any, an opportunity to submit evidence relevant to a complaint.
4. A written determination as to the validity of the complaint and a description of the resolution, if any, shall be issued by Human Resources, and a copy forwarded to the complainant no later than 30 days after its filing.
5. Human Resources shall maintain the files and records relating to complaints filed.
6. If the complainant is dissatisfied with the resolution, he or she may request reconsideration of the case in writing. The request for reconsideration should be made within 15 days to:

LOTT Alliance Executive Director
111 Market Street, Suite 250
Olympia, WA 98501
(360) 528-5720

7. The right of a person to a prompt and equitable resolution of the complaint filed hereunder shall not be impaired by the person's pursuit of other remedies such as the filing of an ADA complaint with the responsible federal department or agency. Use of this grievance procedure is not a prerequisite to the pursuit of other remedies.
8. These rules shall be construed to protect the substantive rights of interested persons to meet appropriate due process standards, and to assure that the City of Jacksonville complies with the ADA and implementing regulations.

Appendix C

		ADMINISTRATIVE GUIDELINE 3 HARASSMENT PREVENTION POLICY	
Prepared By: Human Resources		Approved By: 	
Effective Date: March 13, 2007		Michael D. Strub, P.E. Executive Director	

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	3.5.6	Investigations
	3.5.7	Disciplinary Action
	3.5.8	Assistance
	3.5.9	Communication
	3.5.10	Training

3.1 **PURPOSE**

To clearly state the Alliance policy in regard to harassment, including sexual harassment, and to establish guidelines for preventing harassment and for dealing with all types of harassment if it occurs.

3.2 **REFERENCE**

WA State Law against Discrimination
EEOC Sexual Harassment Guidelines

3.3 **APPLICATION**

This Administrative Guideline applies to all individuals employed by the LOTT Alliance. It applies wherever LOTT Alliance employees may be working; engaging in work related activities with LOTT Alliance approval and sponsorship, or representing the LOTT Alliance. This Guideline also applies to all LOTT Alliance volunteers.

3.4 **POLICY**

It is the LOTT Alliance's intent to provide a workplace free from all verbal, physical and visual forms of harassment. All employees are expected to be sensitive to and respectful of their co-workers and others with whom they come into contact while representing the LOTT Alliance. All forms of harassment, whether due to sex, sexual orientation, marital status, race, color, national origin, citizenship status, creed, religion, age, actual or perceived disability, political ideology, or any other reason are prohibited.

3. 5. GUIDELINES

These guidelines are intended to assist the LOTT Alliance in addressing not only illegal harassment, but also any conduct that is offensive and inappropriate.

3.5.1 Harassment: Examples of the conduct that constitutes harassment that the LOTT Alliance prohibits include, but are not limited to:

- A. Epithets, slurs, negative stereotyping or threatening, intimidating, or hostile acts that are related to sex, sexual orientation, marital status, race, color, national origin, citizenship status, creed, religion, age, actual or perceived disability, political ideology, or any other reason.
- B. Written or graphic material displayed, possessed, or circulated in any LOTT Alliance workplace (including vehicles) that denigrates or shows hostility or aversion toward an individual or group because of their sex, sexual orientation, marital status, race, color, national origin, citizenship status, creed, religion, age, actual or perceived disability, political ideology, or any other reason.
- C. Intimidating, hostile, derogatory, contemptuous, or otherwise offensive conduct or remarks that are directed at a person because of that person's sex, sexual orientation, marital status, race, color, national origin, citizenship status, creed, religion, age, actual or perceived disability, political ideology or any other reason.
- D. Retaliatory behavior such as making slanderous or libelous statements, withholding communication, information, resources, employment benefits, or entitlements because of an individual or group's sex, sexual orientation, marital status, race, color, national origin, citizenship status, creed, religion, age, actual or perceived disability, political ideology, or any other reason.

3.5.2 Sexual Harassment Defined: Sexual harassment is defined as intimidating, hostile, derogatory, contemptuous or otherwise offensive conduct or remarks made because of sex, whether or not the remarks themselves are sexual in nature. The conduct or remarks may be directed at an individual, a group, or the work environment in general. Sexual harassment is also defined as unwelcome conduct of a sexual nature which is deliberate and/or repeated. Such behavior is prohibited if:

- A. Submission to such conduct is either a stated or suggested condition of employment;
- B. Acceptance or rejection of such conduct becomes part of a supervisor's employment decision (such as hiring, firing, promotion, or job assignment);
- C. Such conduct has the purpose or effect of interfering with a person's work; or
- D. The conduct creates an intimidating, offensive, or hostile work environment.

3.5.3 Examples of Sexual Harassment: With respect to sexual harassment, examples of prohibited conduct include but are not limited to:

- A. Vulgar or sexual comments, jokes, stories and innuendo.

- B. Graphic or suggestive comments about someone's body or manner of dress.
- C. Gossip, questions, or comments about someone's sexual conduct or orientation.
- D. Vulgarity, leering, inappropriate touching and obscene or suggestive gestures.
- E. Display, possession, or circulation in the workplace of sexually suggestive photographs, cartoons, graffiti, e-mails and the like, or displaying, transmitting, or downloading of those types of inappropriate or offensive messages from the Internet.
- F. Unwelcome but apparently sanction-free sexual advances by a manager or supervisor to a subordinate or any other employee.
- G. Solicitation or coercion of sexual activity, dates, or the like by the implied or express promise of rewards or preferential treatment by any employee.
- H. Solicitation or coercion of sexual activity, dates, or the like by the implied or express threat of punishment by any employee.
- I. Sexual assault.
- J. Intimidating, hostile, derogatory, contemptuous or otherwise offensive conduct or remarks that are directed at a person because of that person's sex, whether or not the remarks themselves are sexual in nature.
- K. Retaliation against an employee for refusing sexual or social overtures, for complaining about sexual harassment, or for cooperating with the investigation of a complaint.
- L. Engaging in behavior typically called stalking, toward employees either on or off LOTT Alliance premises or on or off work hours.

3.5.4 Employee Responsibilities:

A. Required Action - Reporting Harassment

These requirements apply to harassment or discrimination caused by anyone with whom an employee comes into contact as part of the employee's job such as managers, supervisors, co-workers, customers, vendors, members of boards or commissions, or any others.

- 1) Harassment, particularly sexual harassment, can be difficult to define and misconceptions abound. For this reason, the LOTT Alliance requires employees to use this harassment reporting policy without worrying about whether the conduct involved would be considered harassment in a legal sense. If an employee considers the conduct to be harassment or the behavior to be inappropriate, the employee must report it promptly to a supervisor, a division director, Human Resources, General Counsel, or the Executive Director.
- 2) The LOTT Alliance requires employees to report all incidents of harassment or inappropriate behavior as soon as possible. LOTT is committed to providing employees with a pleasant and productive working environment, but cannot do that if these issues are not brought to the LOTT Alliance's attention. Please join the LOTT Alliance in its efforts to make this an enjoyable place to work for all employees.
- 3) An employee must promptly notify a supervisor, a division director, Human

Resources, General Counsel, or the Executive Director if:

- a. At any time an employee believes he/she is being subjected to harassment;
 - b. An employee becomes aware of such conduct being directed at someone else; or
 - c. The employee believes another employee has received either more favorable or unfavorable treatment because of harassment.
- 4) An employee who experiences or observes harassment, including sexual harassment, may, at his or her option, choose to confront and deal with the harassment to the best of his/her ability. However, no employee is required to do so under any circumstances. Even if an employee chooses to confront the situation directly, the harassment must still be reported to a supervisor, manager, division director, Human Resources, General Counsel, or the Executive Director. This applies to harassment or discrimination caused by anyone with whom an employee comes into contact as part of the employee's job: supervisors, co-workers, customers, vendors, members of boards or commissions or others.

B. Prohibited Conduct

- 1) Employees are not permitted to have romantic or sexual relations with supervisors in their chain of supervision. A supervisor is defined as someone who has the authority or practical power to supervise, hire, terminate, or discipline an employee, who has decision making authority over an employee, or who is responsible for auditing, evaluating, or reviewing the work of an employee.
- 2) It is a violation of this policy to knowingly report false allegations of harassment. Persons found to knowingly report or corroborate false allegations will be subject to appropriate discipline.

3.5.5. Management and Supervisory Responsibilities:

A. Awareness of Work Environment

Management and supervisory personnel of the LOTT Alliance are responsible for being aware of the potential for harassment within their work unit and ensuring a work environment free from all types of harassment, including sexual harassment.

B. Prohibited Conduct

Because of the potential for miscommunication, effects on morale, abuses of authority, misunderstandings, and conflicts of interest, the LOTT Alliance strictly prohibits supervisors from having romantic or sexual relations with any person within their chain of supervision. This prohibition applies to all employees who have the authority or practical power to supervise, hire, terminate, or discipline another employee; who have decision making authority over another employee; or who are responsible for auditing, evaluating, or reviewing the work of another employee.

C. Handling a Complaint

When a supervisor, manager, or division director is confronted with a harassment complaint, he/she is required to:

- 1) Inform the division director.
- 2) Inform Human Resources.

- 3) Determine the nature and extent of the complaint.
- 4) Coordinate with Human Resources to determine the most appropriate and effective response to the complaint.
- 5) Take appropriate action to correct the problem, including taking disciplinary action if warranted.

D. Responding to a Complaint

The LOTT Alliance endeavors to respond to and resolve complaints as quickly as possible and at the lowest possible level. Once a complaint is brought to a supervisor, the supervisor is expected to respond immediately as described in section 3.5.5C. An employee can normally expect a more formal response from the LOTT Alliance to complaints of harassment within 30 days of the date the complaint was made to a supervisor. The formal response shall be verbal and/or in writing to both the complainant and the accused. The timeline is established solely to provide for timely resolution of the situation and may be extended upon the reasonable request of the LOTT Alliance or any party to the complaint.

E. Required Training

Division directors and supervisors in their chains of supervision are responsible for ensuring that all employees and volunteers under their control receive training or are otherwise informed about and understand this Administrative Guideline.

3.5.6. Investigating Reported Incidents: All investigations will be conducted under the following guidelines:

- A. **Confidentiality:** All complaints will be kept confidential to the fullest extent possible. This means they will be disclosed only to witnesses and others as necessary to allow the LOTT Alliance to investigate and respond to the complaint, to management, and others as may be required by law.
- B. **Cooperation During an Investigation:** All employees are expected to cooperate fully with investigation proceedings and answer all questions truthfully and completely in an investigation. Anyone who the LOTT Alliance concludes has failed to cooperate fully; made evasive, misleading, inaccurate, incomplete, or false statements; or otherwise impeded an investigation in any way is subject to disciplinary action up to and including termination. The LOTT Alliance will take action that it deems necessary to prevent an offense from being repeated.
- C. **Retaliation Prohibited:** The LOTT Alliance prohibits retaliation against anyone who makes a good faith complaint or who cooperates in good faith in an investigation. Anyone who the LOTT Alliance concludes has engaged in retaliation is subject to disciplinary action up to and including immediate termination. Disciplinary action will depend on the gravity of the offense. The LOTT Alliance will take whatever action it deems necessary to prevent an offense from being repeated.

3.5.7. Disciplinary Action: Anyone who the LOTT Alliance concludes has violated this harassment guideline is subject to disciplinary action up to and including immediate termination. Disciplinary action will depend on the gravity of the offense. The LOTT

Alliance will take whatever action it deems necessary to prevent an offense from being repeated.

3.5.8 Assistance: Assistance in responding to any type of harassment complaint is available from Human Resources.

3.5.9 Communication: This policy (Administrative Guideline #3) is available to all employees. A current copy of the policy is available from Human Resources. This policy will be communicated to employees through LOTT Alliance-wide interoffice mail distribution; through meetings with division directors, managers and supervisors; and through training. This policy will be distributed to all employees whenever there is a change in the policy or the Administrative Guideline.

3.5.10 Training: All employees, including division directors, managers, supervisors regardless of employment category, (e.g. regular, temporary, emergency hire, seasonal worker, instructor, contract employee) are required to take LOTT Alliance sponsored Harassment Prevention Training periodically. New employees should take this training within 3 months of employment. Certain volunteers may also be required to take LOTT Alliance sponsored Harassment Prevention Training. Supervisors and managers are expected to keep up-to-date on harassment issues, prevention, and response methods through reading materials, LOTT Alliance communications, and training.