

Equal Opportunity and Affirmative Action Employment Policy

PART I Purpose of Policy.

The purpose of this policy is to assure equal employment opportunity and affirmative action to achieve the full use and equal treatment of minority groups, women, and disadvantaged groups at all levels and in all sectors of the work force.

The policies and procedures outlined in the Plan are intended to assure the right of all persons to employment and advancement on the basis of ability.

Part II Statement of Policy.

It is the policy of LAA to provide equal employment opportunity in all aspects of the employer-employee relationship, without discrimination because of race, color, religion, national origin, sex, age, marital status, sexual orientation, physical or mental disability.

Equal employment opportunity, as defined by law, requires affirmative steps to insure the full utilization and non-discriminatory treatment of minorities and women in the work force.

LAA recognizes minorities to include Native Americans, people of color, Hispanic Americans and Asians. (However, only people of color and Hispanic Americans are sufficiently numerous in the available labor force for LAA positions for the establishment of goals and timetables.)

It is the intention of LAA to adhere to both the letter and the spirit of these laws.

Part III Dissemination and Administration of Policy.

This Policy shall be implemented throughout LAA, and shall be the responsibility of all staff members, supervisory and non-supervisory.

The Executive Director of LAA, or his/her designee, shall have overall responsibility for enforcing compliance with this Policy.

This Policy shall be disseminated within LAA as follows:

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- a. This Policy shall be included as part of any LAA Policy Manual;
- b. All present staff members shall be provided with copies of the Policy upon adoption and all new staff members shall receive copies upon joining the LAA staff;
- c. Non-discriminatory clauses shall be included in all Union contracts; and
- d. All applicants for employment shall be informed of the existence of the Policy.

This Policy shall be disseminated outside of LAA as follows:

- a. Recruitment sources such as community organizations, personnel agencies, colleges, law schools and technical institutes which provide a high degree of contact with minorities and women shall be sought out and utilized;
- b. Advertisements for employment shall be placed in news media chosen for their ability to reach all qualified applicants including minorities and women, and shall contain the phrase "An Equal Opportunity Employer"; and
- c. All present or prospective sources of funding for LAA shall be provided with copies of this Policy upon request.

The administration of this Policy shall be the responsibility of the Executive Director of LAA who shall cause the following duties to be performed:

- a. Managing, supervising, and coordinating of the day-to-day operations and activities for implementing the Policy;
- b. Keeping LAA staff informed of new federal, state, and local requirements relating to equal employment opportunity and affirmative action and recommending any necessary program changes;
- c. Reporting as required to all federal, state, and local compliance agencies and to the Executive Committee of the Board;
- d. Administering a system for the receiving and investigating of individual complaints of discrimination in violation of this Policy; and
- e. Conducting periodic work force analyses, the object of which shall be to determine the number of positions and the salary rates held by women and minority staff members in all job classifications, professional and non-professional.

The following methods shall be used to insure that the personnel practices and administration of LAA are non-discriminatory:

- a. Recruitment procedures and job descriptions shall be periodically reviewed to assure that no artificial barriers to the employment of women and minorities exist;
- b. All aspects of the hiring procedure for professional and non-professional staff shall be periodically reviewed to insure that the hiring process is in accord with this Policy;
- c. An annual recruitment plan shall be established by the Executive Director with staff input which implements the employment goals established pursuant to this policy;
- d. All staff member training and benefit programs shall be open to staff members without discrimination on the basis of race, color, religion, national origin, sex, age, martial status, or handicap;
- e. The standards for evaluation, termination, demotion, discipline, and layoff shall be applied to staff members without discrimination on the basis of race, color, religion, national origin, sex, age, marital status, or handicap;
- f. The actual functions of staff members performing in the various job classifications shall be periodically reviewed to assure that equal pay is given for equal work;
- g. A periodic review of LAA's use of suppliers, consultants, and other contractors shall be made so as to assure the fair use, consideration, and treatment of female and minority suppliers, consultants, and services; and
- h. Insofar as possible, the LAA Board of Directors shall have members who are women and minorities, and its various committees shall have female and minority group representation.

Part IV Annual Workforce Utilization Analysis.

The Executive Committee of the LAA Board shall review the workforce of LAA as of December 31 of each year to determine whether and to what extent LAA is under-utilizing minorities or women in its workforce.

The availability of minorities and women shall be measured by the population composition of the City of New Haven for non-attorney positions and by the composition of graduating classes of Connecticut law schools for attorney positions.

The annual utilization analysis shall be presented to the LAA Board at the first board meeting of the calendar year together with a recommendation for staffing goals and timetables for the succeeding year.

Part V Goals and Timetables.

It shall be the policy of LAA to achieve or exceed parity in the utilization of women and minorities in its workforce.

The LAA Board shall annually establish staffing goals and timetables for the achievement of parity in all classifications in which under-utilization of minorities or women exists in its workforce.

The LAA Board shall annually adopt the goals of maintaining of utilization at or above parity for all classifications where there is not under-utilization of minorities or women.

Part VI Monitoring and Enforcement.

It shall be the responsibility of the Board to monitor the performance of LAA with respect to affirmative action.

In discharging its responsibilities, the Board shall have the assistance of the Executive Director and such other staff members as he/she may designate in the collection of data and preparation of reports.

The Board shall require the Executive Director to submit an annual report showing the race and sex composition of the LAA Board and staff personnel.

The Executive Director shall establish procedures, with the advice and consent of the Board, for the investigation and adjudication of informal and formal complaints of discrimination in violation of this Policy. The procedures shall be adopted in accordance with the LAA staff member Grievance Policy as provided in the current Collective Bargaining Agreement.