



# **EQUAL EMPLOYMENT OPPORTUNITY PLAN 2021-2023**

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## Statement of Policy

Chatham County issued its first formal Equal Opportunity Employment Plan in 2021. The plan was implemented to ensure that Chatham County complied with federal laws affecting discrimination and adverse impact. The intent of this program is to create and maintain an environment that is respectful of fairness and equity for employees, applicants, and customers, serve as a resource by providing guidance to hiring managers to achieve a diverse workplace, and ensure compliance with state and federal laws.

Chatham County is committed to ensuring the administration and implementation of all human resources policies, practices and programs are fair and equitable without unlawful discrimination, harassment or retaliation on the basis of race, religion, color, national origin, sex (including pregnancy), sexual orientation, gender identity, age (40 or older), political affiliation, genetic information, or disability, except where age, sex, or physical requirements constitute bona fide occupational qualifications. Equal opportunity covers all employees and applicants for employment. Equal opportunity also covers all personnel and employment programs as well as management practices and decisions. Any form of workplace harassment or retaliation against one engaged in protected activity will not be tolerated.

Equal employment, as established in our plan, includes specific objectives and action steps to ensure that all applicants and employees, especially those in protected classes, are treated fairly and are equitably represented in Chatham County's workforce. The plan includes, but is not limited to the following elements:

1. An analysis of Chatham County programs and policies to prevent unlawful discrimination, either intentional or unintentional, affecting all employment practices, including recruitment and selection; promotions, demotions, and transfers; compensation, training, benefits, discipline and all other terms and conditions of employment.
2. An analysis of the race and gender composition of the County's workforce and the labor market to identify areas of concentration as well as underutilization of minorities, females and others within the County's workforce including a self-assessment, barrier analysis and plans to address barriers.
3. The development of a method and working group charged with implementing and evaluating the Equal Opportunity Employment Plan and provisions for continuous improvements to the plan.
4. The responsibility for the implementation of the County's Equal Employment Opportunity program is assigned to its EEO Officer who will work closely with the Human Resources and Risk Management Director and the EEO Working Group.
5. All management personnel share in this responsibility and specific training is provided to ensure compliance is achieved.
6. All applicants and employees of Chatham County have the right to file complaints alleging

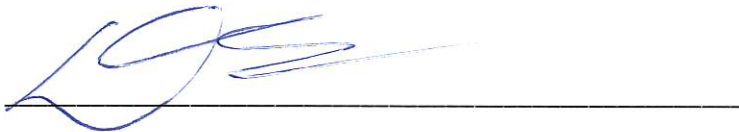


discrimination with the EEO Officer or with any of its designated officials.

The Equal Employment Opportunity Plan will be updated and revised periodically to reflect changes in federal and/or state anti-discrimination laws. This plan will be monitored by the EEO Working Group, a group of diverse employees (gender, race, supervisor/non-supervisor, etc.) who will be tasked with conducting regular internal audits, barrier analyses and any other necessary tasks to address any barriers to equal opportunity. This group will meet bi-monthly and will work directly with the Human Resources and Risk Management Department and EEO Officer to ensure effective implementation of the EEO Plan. This group is vital to the success and acceptance of the County's EEO Plan. A list of the current members is below:

Courtney Jones	Human Resources Analyst, Human Resources & Risk Management
Hilary Pollan	Community Partners Analyst, County Manager's Office
Michelle Wright	Equity & Community Engagement Initiatives Lead, Health Department
Nellie Benitez	Lead and Focus on Fathers Program Specialist IV, Health Department
Renita Foxx	Court Programs Director, Court-Related Programs
Jennifer Yancey	WorkFirst Caseworker, Department of Social Services
Stephanie Watkins-Cruz	Policy Analyst, County Manager's Office
Kevin Lindley	Environmental Quality & Sustainability Director
Angela Ritter	Library Assistant II, Wren Library
Wayme Marsh	Utility Inspector/Cross Connection ORC, Public Works
Mike Cowell	Branch Manager, Wren Library

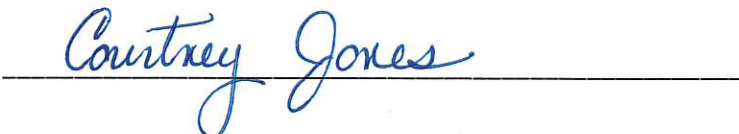
All employees of Chatham County have the right to review and comment on the Equal Opportunity Plan. A copy of the plan will be available in the administrative offices of each department and on the County's external and internal websites. The EEO policy statement shall be prominently posted in all personnel offices. Any questions relating to the details of this Plan should be referred to the Human Resources and Risk Management Department at (919) 542-8200.



Dan LaMontagne, County Manager

4/21/21

Date



Courtney Jones, Human Resources Analyst, EEO Officer

4/26/21

Date

## **Statement of Anti-Discrimination and Equal Employment Opportunity**

Chatham County is fully committed to equal employment opportunity (EEO) principles and issues this anti-discrimination/EEO compliance clause to support and maintain employee's rights and responsibilities relating to equal employment. The core of equal employment opportunity is the right to work and advance on the basis of merit, ability, and potential, free from prejudice or discrimination. In accordance with the applicable anti-discrimination statutes, executive orders, and other authorities, Chatham County protects employees against discrimination, to the fullest extent of law, on the basis of race, color, religion, sex (including pregnancy), national origin, sexual orientation, gender identity, age, disability, genetic information, marital status, political affiliation, whistleblower activity, parental status, and military service (past, present, or future), and against retaliation for participation in EEO activity or opposition to discrimination.

### **Chatham County Harassment and Discrimination Policy**

**(Excerpted from Chatham County Personnel Policy, Article V, Section 4)**

**Last Updated: July 20, 2020**

#### ***Section 4: Harassment and Discrimination***

- A.** Harassment and discrimination, either physical or verbal, is a violation of the law and county policy. The intent of this section is to clarify Chatham County's position on the prevention, discovery, and remedy of harassment and discrimination in the workplace. It is the intent of Chatham County to maintain a workplace free of harassment and discrimination from any source. This section affirms the county's refusal to tolerate harassment and discrimination; informs managers, supervisors and other employees of performance expectations, guidelines, and possible penalties related to harassment and discrimination; and provides procedures for employees who believe they have been harassed.
- B.** This harassment and discrimination section applies to all officers and employees of Chatham County, including, but not limited to, full and part-time employees, elected officials, regular and temporary employees, volunteers, employees covered by or exempted from other personnel rules or regulations, and individuals working under contract for the County.
- C.** Harassment and discrimination are defined as unsolicited and unwelcome sexual advances; unsolicited and unwelcome requests for sexual favors; and other unsolicited and unwelcome verbal or physical conduct of a sexual, harassing, or discriminatory nature, when:
  - 1.** Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
  - 2.** Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or
  - 3.** Such conduct has the purpose or effect of substantially interfering with a person's work performance or creating an intimidating, hostile, or offensive work environment.
- D.** Prohibited acts of harassment and discrimination can take a variety of forms, ranging from subtle pressure for sexual activity to disparate acts in hiring and discipline. Some examples include, but are not limited to, the following:
  - 1.** Unsolicited and unwelcome conduct in the form of pinching, grabbing, patting, or propositioning;

2. Making either explicit or implied job threats or promises in return for submission to sexual favors;
3. Making sexually oriented comments on appearance, including dress or physical features;
4. Telling sexually explicit stories;
5. Displaying sexually explicit or pornographic material or pictures that may embarrass or offend employees in the workplace, regardless of the method of display;
6. Sexual assaults on the job by supervisors and fellow employees;
7. Jokes or remarks of a sexual or discriminatory nature made in front of people who find them offensive;
8. Use of sexually suggestive objects;
9. Prolonged staring or leering at a person;
10. Whistling so as to attract the attention of a person;
11. Continued invitations to social events outside the workplace, after being told such invitations are unwelcomed;
12. Use of offensive terms that have a sexual or discriminatory nature; and
13. Use of sexually degrading or discriminatory words to describe a person.

The harassment and discrimination policy has been violated when any of the foregoing conduct (1) influences employment decisions, (2) makes the job environment hostile, or (3) unreasonably interferes with work performance.

- E. The purpose of the harassment and discrimination policy shall not be used to bring frivolous or malicious charges against employees or public officials. Harassment and discrimination do not include personal compliments welcomed by the recipient or social interactions or relationships freely entered into by employees or prospective employees.
- F. This section will be distributed to all employees of the county. Every employee will be required to acknowledge his or her receipt of this section in writing. A copy of the acknowledgment shall be kept in the regular personnel file. Department heads, office holders and supervisors shall be responsible for ensuring that all employees under their direction are familiar with this section.
- G. Procedures for Handling Harassment and Discrimination Issues
  1. Because behavior that may offend an employee may not be intended as harassment, it is encouraged that the employee, who believes he/she has been harassed, first tell the individual that the behavior is offensive and ask that the behavior stop. If the employee is not comfortable with confronting the individual responsible for the offending behavior, the employee should attempt to resolve the matter with the supervisor or department head most directly concerned, excluding the person accused of harassment and/or discrimination.
  2. If any employee believes that he/she has been the subject of harassment and/or discrimination and if the direct resolution approach set out above (if appropriate) has failed to produce a result satisfactory to that person, then he/she may proceed through the appropriate grievance procedure as outlined in Article IX of this policy. If a complaint is resolved to the satisfaction of the grievant but not to the accused, the accused may proceed through the grievance procedure.
  3. The employee should be prepared to provide the following information when reporting sexual harassment:
    - a. Employee's (Complainant's) name, department, and position title;
    - b. The name of the person or persons committing the harassment and/or discrimination, including their title/s, if known;

- c. The specific nature of the harassment and/or discrimination, how long it has gone on, and any employment action (demotion, failure to promote, dismissal, refusal to hire, transfer, etc.) taken against the complainant as a result of the harassment, or any other threats made against the complainant as a result of the harassment;
  - d. Witnesses to the harassment; and
  - e. Whether the complainant has previously reported such harassment and, if so, when and to whom.
- H. When at all possible, the county encourages employees to follow the line of authority in reporting harassment and discrimination. If the County Manager or an elected official be named as an offending party, the County Attorney should be advised.
- I. Employee Obligation
  - 1. Employees are not only encouraged but are obligated to report instances of harassment and discrimination. Internal interference, coercion, restraint, or reprisal against any person complaining of alleged harassment and discrimination is prohibited. Harassment and discrimination expose the county to liability, and a part of each employee's job is to reduce the county's exposure to liability.
  - 2. Employees are obligated to cooperate in every investigation of harassment and discrimination of which they have knowledge, including, but not limited to, the following:
    - a. Coming forward with evidence, whether favorable or unfavorable to a person accused of harassment and/or discrimination, and
    - b. Fully and truthfully answering questions during the course of a harassment and/or discrimination investigation.
  - 3. All personnel shall maintain confidentiality about complaints to protect the parties involved. Information shall not be shared with anyone other than those involved in the investigation. All records placed in the personnel file are protected by the guidelines established in North Carolina General Statute 153A-98.
- J. Based on the seriousness of the offense, employees determined to have violated this section shall be subject to disciplinary action set forth in Article VIII of this policy, including reprimand, suspension, involuntary transfer, demotion, and dismissal. Employees found to be in violation of this section shall have the same rights and obligations as other employees subject to disciplinary actions, as set forth in Article VIII of this policy.

## **Chatham County Workplace Violence Policy & Procedure**

**Last Updated: May 24, 2011**

### **Background**

Workplace violence includes any physical assault, verbal abuse, or threatening behavior that occurs in the workplace. The workplace is any location (permanent or temporary) where an employee performs any work-related duty. This includes, but is not limited to, buildings and the surrounding perimeters including the parking lots, field locations and traveling to and from work assignments.

Violence or threats of violence include any activity by an individual that results in harm to an employee or causes an employee to feel unsafe due to the threat of harm. Violence may take the form of physical aggression, verbal threats to harm another person or damage property or harassment including sexual harassment. Threats of violence include possession or display of a weapon of any type or exhibiting an object in such a manner that it appears to be a weapon.

There are different types of workplace violence, depending on the relationship between the employee and the person committing the violence.

1. **Stranger to Employee:** Violence is committed by a stranger. There is no known relationship to the employee or workplace. The stranger may enter the workplace to commit a violent act or may act outside the workplace while the employee is in the course of his/her job, such as making a delivery or bank deposit.
2. **Customer/Citizen to Employee:** Violence is committed by someone who receives a service from the agency. The violence is committed in the workplace or outside the workplace, and while the employee is performing a job-related function.
3. **Partner to Employee:** Violence is committed by someone who has a personal relationship with the employee, such as a current or former spouse or partner, a relative or a friend. This would include an individual who has a personal dispute with an employee and enters the workplace to harass, threaten, injure, or kill.
4. **Employee to Employee:** Violence is committed in or outside the workplace by a current or former employee, a prospective employee or a current or former supervisor or manager.

Warning signals may alert you to any person who could become violent. Warning signals for potential violence include:

- Major changes in personal appearance, attitude, or behavior
- Change in personal relationships (such as the break-up of a relationship)
- Reduction in job efficiency or productivity
- History of violent, reckless, or antisocial behavior
- Unusual interest or unexplained pre-occupation with weapons or bringing weapons to work
- Serious stress in the employee's life (such as finances, personal or health)
- Substance abuse at work (alcohol and/ or drugs)
- Increased absenteeism from work
- Unexplained signals of physical injury (such as bruises, injuries, or cuts)
- Loitering around the worksite before or after normal working hours
- Agitation
- Inability to make eye contact with co-workers or supervisors
- Unexplained interest in what you do at work (such as your schedule, procedures for handling money or security policies)



## **Policy**

The purpose of these safety policies and procedures is to prevent and/or manage all acts of violence and threats of violence by or against its employees in the workplace during assigned duty times. Management commitment includes the establishment of these policies and procedures and the resources needed to address workplace violence.

Violations of this policy by employees of the County may lead to disciplinary action, up to and including dismissal.

Employees who are subject to or become aware of any violent acts or threats of violence shall immediately report the matter to their supervisor or the Human Resources Director. No reprisals will be taken against any employee who, in good faith, reports violent acts or threats of violence against an employee. This shall be done by making sure all reports are handled with respect to confidentiality. The County will act on all reports appropriately upon gathering the facts.

Supervisors or other managers who receive a report of violence or a threat of violence shall take them seriously and immediately assess the situation, determine the nature of the threat, and decide on the action to be taken.

Employees are to report to their immediate supervisor, any behavior of strangers, customers, citizens, partners, other employees, or anyone else at the workplace that is violent, could be taken as threatening or intimidating or might lead to violence. All supervisors and managers are to take such acts or threats seriously so that all employees can feel secure in the workplace. No one should minimize the danger that can occur by not addressing the warning signs that signal danger for an employee.

When violence or threats of violence are reported, supervisors are to attempt to defuse the situation. However, if the perpetrator persists in their threats, they will be reported to law enforcement. If the perpetrator should reappear after such action, the supervisor and/ or police shall be contacted again. All County actions shall be documented by the supervisor or the manager taking the action.

### **Legal Definition of Threats**

GS 14-277.1. Communicating threats: A person is guilty of a Class 1 misdemeanor if without lawful authority:

1. He/she willfully threatens to physically injure the person or that person's child, sibling, spouse, or dependent or willfully threatens to damage the property of another;
2. The threat is communicated to the other person, orally, in writing, or by any other means;
3. The threat is made in a manner and under circumstances which would cause a reasonable person to believe that the threat is likely to be carried out and
4. The person threatened believes that the threat will be carried out.

Agency procedure when threats are communicated:

1. Notify immediate supervisor
2. Notify local law enforcement ex. Pittsboro Police Dept., Siler City Police Department and Chatham County Sheriff's Office.
3. File a formal complaint with the magistrate's office either in Pittsboro or Siler City.

**Procedures**

The following procedures provide a framework to help protect employees from work related violence or threats of violence. By addressing workplace violence as preventable and manageable, practical, and effective strategies can be carried out to protect employees from these risks and provide a safe workplace.

- a. When it appears that an employee may be in immediate physical danger, the endangered employee or any observing employee shall notify the nearest available law enforcement agency. When action is taken, the information shall be reported to the manager, supervisor, and director as soon as possible.
- b. When the danger of physical harm to an employee does not appear to be immediate, gather all available information and provide a full report of circumstances to the supervisor, division manager or director.

Usually, a person does not abruptly become violent. A person's behavior gradually escalates over time. After experiencing a trigger event, the perpetrator may exhibit a physical or behavioral sign that violence may be about to occur.

**Threatening Behavior**

Listed below, in the table, are the three levels of violence.

<i>Level One:</i>	<i>Level Two:</i>	<i>Level Three:</i>
<ul style="list-style-type: none"> <li>• Refuses to cooperate</li> <li>• Spreads rumors</li> <li>• Argues consistently</li> <li>• Acts belligerent</li> <li>• Swears constantly</li> <li>• Makes unwanted sexual comments</li> </ul>	<ul style="list-style-type: none"> <li>• Argues increasingly</li> <li>• Refuses to obey and/or sabotages</li> <li>• Verbalizes</li> <li>• Sees self as victim</li> <li>• Is overly interested in weapons</li> <li>• Behaves hostile to clients on the telephone or face-to-face</li> </ul>	<ul style="list-style-type: none"> <li>• Makes suicidal threats</li> <li>• Starts and/or participates in fights</li> <li>• Destroys property</li> <li>• Uses weapon</li> <li>• Commits murder and/or rape</li> <li>• Commits arson</li> </ul>

## Ways to Manage Threatening Behavior

### Things to Do for Level I and II

- Stay calm, listen attentively, and ask the person to sit down
- Ask the person questions relevant to his or her complaint
- Acknowledge the person's concerns and try to find solutions
- Maintain eye contact
- Identify violent behaviors, especially before they escalate.
- Set ground rules/boundaries, such as, "when you shout at me, I can't understand what you are saying."
- Keep the situation in your control. Stay calm do not react. See bullet #1
- Talk to your supervisor as soon as possible

### Things to do for Level III

- Get yourself and others away from the potentially violent person
- Call 911
- Get out or hide. Evacuate the area.

### Things to do in ANY threatening situation

- **Interrupt** – when you hear raised voices or arguments coming from a nearby office. Go to the employee's door and listen to determine if it is a threatening situation. If you feel the employee is in danger, interrupt and ask to speak to them outside.
- **Alert Others** - Always alert other employees of a possible need for help. Employees should always notify a co-worker or supervisor prior to bringing a customer in the office. If staff observes threatening or angry behavior in a customer or citizen outside the building or in the office, or in one who has just left your presence, alert others in the building that may also have contact with the person.
- **End the Conversation** -- If you handle a phone call where the person is abusive, using obscene language or is threatening – end the conversation but make note of the occurrence.
- **Stay in Communication** -- When visiting an isolated or remote area of the county, you are encouraged to take a County cell phone, use a buddy system and/or request a law enforcement officer to accompany you.
- **Separate from Scene** -- When a volatile situation is imminent, remove people from the office and surrounding areas as soon as possible.



## **Ways to Stay Safe**

- Do not make false statements or promises you cannot keep.
- Do not explain technical, complicated information when emotions are high.
- Do not take sides or disagree.
- Do not take remarks personally.
- Do not show your anger.
- Do not patronize.
- Do not invade the individual's personal space.
- Do not use verbal and non-verbal (body language) hostile style of communicating.
- Do not make threats or dares.
- Do not belittle or make the person feel foolish.
- Do not criticize or act impatient.
- Do not attempt to "bargain" with a threatening individual.

## **Training and Education**

Training and education ensure that all staff is aware of potential safety hazards and the procedures for protecting themselves and their co-workers. The training program will involve all employees, including supervisors and managers. New and reassigned employees will receive an initial orientation prior to being assigned their job duties and required training will be provided to employees annually.

Following training, supervisors and managers will be able to recognize a potentially dangerous situation and to make any necessary changes in the physical building, customer service or safety policy and procedures to address employee safety.

## **Whistleblower Policy**

**(Excerpted from Chatham County Personnel Policy, Article V, Section 6)**

**Last Updated: July 20, 2020**

- A. Chatham County is committed to operating in furtherance and in compliance with all applicable laws, rules, and regulations, including those concerning accounting and auditing, and prohibits fraudulent practices by any of its board members, employees, or volunteers. In compliance with 5 U.S.C. § 2302, this policy outlines a procedure for employees to report actions that an employee reasonably believes violates a law, or regulation or that constitutes fraudulent accounting or other practices. This policy applies to any matter which is related to the County's business and does not relate to private acts of an individual not connected to the business of the County.

If an employee has a reasonable belief that an employee or the County has engaged in any action that

violates any applicable law, or regulation or constitutes a fraudulent practice, the employee is expected to immediately report such information to the Human Resources and Risk Management Director. If the employee does not feel comfortable reporting the information to the Human Resources and Risk Management Director, he or she is expected to report the information to the County Manager.

All reports will be followed up promptly, and an investigation conducted. In conducting its investigations, the County will strive to keep the identity of the complaining individual as confidential as possible, while conducting an adequate review and investigation.

Chatham County will not retaliate against an employee in the terms and conditions of employment because that employee: (a) reports what the employee believes in good faith to be a violation of the law; or (b) participates in good faith in any resulting investigation or proceeding, or (c) exercises his or her rights under any state or federal law(s) or regulation(s) to pursue a claim or take legal action to protect the employee's rights. Such violations may include:

A gross mismanagement of a federal contract or grant;

1. A gross waste of federal funds;
2. An abuse of authority relating to a federal contract or grant;
3. A substantial and specific danger to public health or safety; or
4. A violation of law, rule or regulation related to a federal contract or grant.
5. Chatham County may take disciplinary action (up to and including termination) against an employee who in management's assessment has engaged in retaliatory conduct in violation of this policy.

## **Chatham County Language Access Plan**

**Last Updated: December 16, 2013**

### **Purpose**

The purpose of this Policy and Plan is to ensure compliance with Title VI of the Civil Rights Act of 1964, and other applicable federal and state laws and their implementing regulations with respect to persons with limited English proficiency (LEP). Title VI of the Civil Rights Act of 1964 prohibits discrimination based on the ground of race, color or national origin by any entity receiving federal financial assistance. Administrative methods or procedures, which have the effect of subjecting individuals to discrimination or defeating the objectives of these regulations, are prohibited.

In order to avoid discrimination on the grounds of national origin, all programs or activities administered by Chatham County must take adequate steps to ensure that their policies and procedures do not deny or have the effect of denying LEP individuals with equal access to benefits and services for which such persons qualify. This Policy defines the responsibilities the agency has to ensure LEP individuals can communicate effectively. This policy and plan are effective December 16, 2013.

## I. Scope of Policy

These requirements will apply to Chatham County (herein referred to as “the agency”) including subcontractors, vendors, and sub recipients.

The agency will ensure that LEP individuals are provided meaningful access to benefits and services provided through contractors or service providers receiving subgrants from the agency.

## II. Definitions

- A. **Limited English Proficient (LEP) individual** – Any prospective, potential, or actual recipient of benefits or services from the agency who cannot speak, read, write, or understand the English language at a level that permits them to interact effectively with health care providers and social service agencies.
- B. **Vital Documents** – These forms include, but are not limited to, applications, consent forms, all compliance plans, bid documents, fair housing information, citizen participation plans, letters containing important information regarding participation in a program; notices pertaining to the reduction, denial, or termination of services or benefits, the right to appeal such actions, or that require a response from beneficiary notices advising LEP persons of the availability of free language assistance, and other outreach materials.
- C. **Title VI Compliance Officer** - The person or persons responsible for compliance with the Title VI LEP policies.
- D. **Substantial number of LEP** - 5% or 1,000 people, whichever is smaller, are potential applicants or recipients of the agency and speak a primary language other than English and have limited English proficiency.

## III. Providing Notice to LEP Individuals

A. The agency will take appropriate steps to inform all applicants, recipients, community organizations, and other interested persons, including those whose primary language is other than English, of the provisions of this policy. Such notification will also identify the name, office telephone number, and office address of the Title VI compliance officer(s). List the current name, office telephone number and office Address of the Title VI compliance officers:

Carolyn Miller, Human Resources & Risk Management Director  
Chatham County, P.O. Box 1809, Pittsboro, NC 27312  
Phone: 919-545-8301

(Note: The agency must notify the DCA compliance office immediately of changes in name or contact information for the Title VI compliance officer.)

B. The agency will post and maintain signs in regularly encountered languages other than English in waiting rooms, reception areas and other initial points of contact. These signs will inform applicants and beneficiaries of their right to free language assistance services and invite them to identify themselves as persons needing such

services. Identify areas within the agency where these signs will be posted: Chatham County – Offices of Administration, Finance, and Planning

C. The agency will include statements of the right to free language assistance in Spanish and other significant languages in all outreach material that is routinely disseminated to the public (including electronic text).

D. The agency will also disseminate information in the following manner:

Information will be disseminated to the media for publication and citizens through our Public Information Officer.

#### **IV. Provision of Services to LEP Applicants/Recipients**

##### **A. Assessing Linguistic Needs of Potential Applicants and Recipients**

1. The agency will assess the language needs of the population to be served, by identifying:

- the language needs of each LEP applicant/recipient;
- the points of contact where language assistance is needed; and
- the resources needed to provide effective language assistance, including location, availability, and arrangements necessary for timely use.
- Other (*describe*):

2. Determining the Language Needs of the Population to be Served

The agency is responsible for assessing the needs of the population to be served. Such assessment will include, but not be limited to the following:

a. The non-English languages that are likely to be encountered in its program will be identified.

b. An estimate of the number of people in the community for whom English is not the primary language used for communication will be completed and updated annually. To identify the languages and number of LEP individuals' local entities should review:

- census data
- school system data
- reports from federal, state, and local governments
- community agencies' information, and
- data from client files
- Other (*describe*):

c. The points of contact in the program or activity where language assistance is likely to be needed will be identified.

#### B. Determining the Language Needs of Each Applicant/Recipient

The agency will determine the language needs of each applicant/recipient. Such assessment will include, but not be limited to the following:

a. At the first point of contact, each applicant/recipient will be assessed to determine the individual's primary language.

The following methods will be used:

- multi-language identification cards, a poster-size language list, or the use of "I speak" peel-off language identification cards for indicating preferred languages
- English proficiency assessment tools, provided they can be administered in a manner that is sensitive to and respectful of individual dignity and privacy
- Other (*describe*):

b. If the LEP person does not speak or read any of these languages, the agency will use a telephone interpreting service to identify the client's primary language.

c. Staff will not solely rely on their own assessment of the applicant or recipient's English proficiency in determining the need for an interpreter. If an individual requests an interpreter, an interpreter will be provided free of charge. A declaration of the client will be used to establish the client's primary language.

d. When staff place or receive a telephone call and cannot determine what language the other person on the line is speaking, a telephone interpreting service will be utilized in making the determination.

e. If any applicant/recipient is assessed as LEP, they will be informed of interpreter availability and their right to have a language interpreter at no cost to them with a notice in writing in the languages identified in Section C. Provisions of Written Translations.

#### V. Provision of Bilingual/Interpretive Services

1. The agency will ensure that effective bilingual/interpretive services are provided to serve the needs of the non-English speaking population. The provision of bilingual/interpretive services will be prompt without undue delays. In most circumstances, this requires language services to be available during all operating hours.

2. The agency will provide language assistance at all levels of interaction with LEP individuals, including telephone interactions. Describe how this requirement will be met: Chatham County will use bilingual staff as available; however, should it be required, the County may use paid interpreters and/or qualified employees of other agencies or community resources as needed. Telephone interpreter services will only be utilized as a back-up system or where other language assistance options are unavailable.

3. Interpreter Standards

Those providing bilingual/interpretive services will meet the linguistic and cultural competency standards set forth below. The agency will ensure that interpreters and self-identified bilingual staff, have first been screened to ensure that the following standards are met before being used for interpreter services:

- Can fluently and effectively communicate in both English and the primary language of the LEP individual
- Can accurately and impartially interpret to and from such languages and English
- Has a basic knowledge of specialized terms and concepts used frequently in the provision of the agency’s services
- Demonstrates cultural competency
- Understands the obligation to maintain confidentiality
- Understands the roles of interpreters and the ethics associated with being an interpreter

Describe how the agency ensures the competency of bilingual staff and interpreters:

Chatham County will ensure that any bilingual staff and/or interpreters are able to effectively perform items i through vi as detailed above. Following is a list of bilingual employees in Chatham County:

Name	Department	Languages Spoken	Interpreter	Phone Numbers
Ingrid Castro Salinas	Health – Clinical & Community Health Services	Spanish	Yes	(919) 742-5641 Ext. 4242
Nelinda Benitez	Health – Environmental Health	Spanish	Yes	(919) 545-8340
Evi Bonilla	Health – Clinical & Community Health Services	Spanish	Yes	(919) 742-5641 Ext. 8239
Alicia Doran	Health – Clinical & Community Health Services	Spanish		(919) 742-5641 Ext. 8254
Alberto Estrada	Sheriff’s Office	Spanish	No	(919) 542-2811
Monica Goodwin	Social Services	Spanish	Yes	(919) 642-6995



Cristal Ocampo-Jimenez	Health – Clinical & Community Health Services	Spanish	Yes	(919) 742-5641 Ext. 8221
Feliciano Jimenez	Sheriff's Office	Spanish	No	(919) 542-2811
Christie Layden	Social Services	Spanish	Yes	(919) 642-6911
Roxana Lopez	Health – Environmental Health	Spanish	Yes	(919) 545-8390
Alejandra (Alex) Mashburn	Social Services	Spanish	Yes	(919) 642-6928
Mercedes Medel	Social Services	Spanish		(919) 542-2759
Yuridia Robles Ocampo	Sheriff's Office	Spanish		(919) 542-2811

### Definitions of Terms

Chatham County complies with all Equal Employment Opportunity (EEO) rules and regulations. Below are definitions of terms used in the above policies and procedures not included within the policy:

1. **Discrimination:** treating someone (an applicant or employee) unfavorably because of personal characteristics protected under the provisions of the Equal Employment Opportunity Act. The County extends these protections to include sexual preference and gender identity. More information about the types of protected personal characteristics can be found at the [Equal Employment Opportunity website](#).
2. **Equal Employment Opportunity Commission (EEOC):** The U.S. Equal Employment Opportunity Commission (EEOC) is responsible for enforcing federal laws that make it illegal to discriminate against a job applicant or an employee because of the person's race, color, religion, sex (including pregnancy), national origin, age (40 or older), disability or genetic information. It is also illegal to discriminate against a person because the person complained about discrimination, filed a charge of discrimination, or participated in an employment discrimination investigation or lawsuit.
3. **Grievance:** A claim or complaint of an event or condition which adversely affects the circumstances under which an employee works, allegedly caused by the misinterpretation, unfair application, or lack of an established policy pertaining to employment conditions.
4. **Harassment:** Conduct that demonstrates hostility or derision toward another person or group of persons on the basis of age, sex, gender identity, sexual preference, race, color, religion, disability, or national origin. Harassment may include conduct between supervisors and employees, between employees, and by members of the public toward employees. Harassing behavior by employees toward the public is considered a form of detrimental personal conduct.

Harassment in the workplace has the purpose or effect of:

- adversely affecting employment opportunities or conditions of employment or
- unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

Examples include (but are not limited to):

- use of abusive or derogatory racial, age or gender-based terms, or such terms based on national origins, religion, affectional preference or disabling conditions
- unfair assignment of work on the basis of race or gender stereotypes rather than job class or skill/ability level
- displaying objects or pictures in the workplace that demonstrate hostility or a derogatory attitude toward members of protected groups
- threatening or intimidating actions
- jokes which are offensive to a person's age, sex, race, color, religion, disability, national origin, affectional preference, gender identity, gender expression, or marital status, and are continued after the offended person has made his feelings known or
- any abusive/unfair treatment of a person based on his or her age, gender, race, disability, religion, national origin, affectional preference, gender identity, gender expression, or marital status.

4. **Respondent:** The person who is alleged to have engaged in a serious incident.

5. **Retaliation:** Any adverse action taken against an individual for reporting a serious incident; testifying or participating in any way in an investigation, proceeding, or lawsuit related to a serious incident, or because of opposition to employment practices in violation of the unlawful workplace harassment policy.

5. **Workplace violence:** Any act or threat of physical violence, harassment, intimidation, or other threatening disruptive behavior that occurs at the work site. It ranges from threats and verbal abuse to physical assaults and even homicide. It can affect and involve employees, clients, customers, and visitors.

## Dissemination

### A. Internal

The County's EEO Plan shall be communicated to all County employees by utilizing the following methods of communication.

1. At least bi-annually, the County Manager shall discuss or remind department heads of the importance of achieving the County's EEO goals to ensure implementation and application of the EEO Plan.
2. At least bi-annually, the County Manager shall describe or discuss the County's EEO Plan, policy



and goals, and the positive need for diversity in our work force with department heads at their staff meetings.

3. All managers and supervisors are required to attend New Supervisor Orientation which includes a module on EEO and diversity training, as well as Legal Requirements, within one (1) month of their appointment.
4. Human Resources and Risk Management shall post a notice of the County's EEO policy in department common areas for employees to see and periodically visit work sites to ensure that the policy notice is posted as well as all required postings of federal and state employment laws.
5. Human Resources and Risk Management shall inform new employees of the EEO policy during their new employee orientation. All new employees are required to attend a half day orientation which includes a section on diversity, inclusion, and equity.
6. Human Resources and Risk Management shall ensure that the EEO policy is in all employee handbooks, reports, and manuals.
7. Human Resources and Risk Management shall ensure that the County's EEO designation is included in the appropriate brochures or documents concerned with recruitment, hiring practices, and benefits.

## **B. External**

The County's EEO Plan, the goal of achieving a diverse work force, and EEO policy shall be disseminated to the public in the following manner:

1. The County's website, [www.chathamcountync.gov](http://www.chathamcountync.gov), prominently displays the County as an equal opportunity employer on its homepage.
2. State and Federal regulatory agencies shall have access to the EEO Plan upon request.
3. Recruitment sources shall have access to the EEO Plan upon request.
4. The County Manager, Human Resources and Risk Management Director and all department heads and supervisors shall inform other groups or persons through their personal contacts, associations, and outside organizations, of the County's EEO Plan, policy and goals, advertisements for employment and application forms as may be appropriate.

## **Designation of Responsibilities**

All Chatham County employees are responsible for maintaining a work environment that embraces diversity, models our values, and treats all people with respect.

## **Employees**

All employees are also expected to:

- For harassment, discrimination, or retaliation cases, immediately inform your division and/or department director; encourage the person with the complaint to file a formal complaint or to contact the Human Resource and Risk Management Office for assistance.

- For potential workplace violence cases, contact your division and/or department director; for suspicion of imminent violence, please contact local law enforcement immediately.
- For safety violations or concerns, contact your immediate supervisor and the Safety and Risk Manager for assistance; immediately take action to restore safe conditions.
- Participate in administrative investigations when requested.
- Keep information that is shared with an investigator confidential.

### ***Department Heads***

All department heads also are expected to:

- Take any immediate remedial action required to restore the workplace.
- Immediately notify the Human Resources and Risk Management Director of suspicions, allegations, or actual serious incidents.
- Support or conduct an investigation at the County Manager or EEO Officer's direction.
- Provide training for personnel on the procedures for handling serious incidents and maintaining a healthy and productive workplace.
- Support their supervisors/managers in providing ongoing guidance about what constitutes inappropriate workplace behaviors or serious incidents.
- Assure that allegations serious incidents are promptly investigated.
- Assure that employees receive ongoing training and information about serious incidents.
- Refrain from any harassment, retaliation, or discrimination in workplace behaviors, operations, or decisions.
- Make hiring, promotional, and work assignment decisions based on employee skills, abilities, competencies, and performance, not on personal characteristics that are protected under this policy (age, sex, race, disability, etc.).

### ***Managers and Supervisors***

Managers and supervisors are expected to exhibit exemplary behavior and treat all employees with respect. These staff members have the responsibility of ensuring compliance with all equal employment opportunity polices within their areas of supervision. Their responsibilities under the EEO Plan include the following:

- Managers and supervisors will be required to conduct periodic meetings to inform their employees of the existence of the EEO Plan and establish individual employee responsibilities for implementing the Plan.
- Establishing department EEO goals and objects and identifying and resolving issues.
- Actively participating and representing Chatham County in community groups and organizations who serve protected classes.
- At least two times a year, during staff and team meetings, the department head and/or managers and supervisors will discuss the importance of workforce diversity and awareness and review County policies and procedures as well as the need to maintain a respectful workplace.

- Ensure that protected group members are provided with equal opportunity for hiring, training, promotion, transfer, and career counseling.
- Provide counseling to employees to inform them of promotional and training opportunities available to them.
- Conduct quarterly tours of department facilities to ensure that all legal notices are properly displayed in the appropriated places.

### ***Human Resources and Risk Management Staff***

All Human Resource and Risk Management staff members are expected to:

- Assure that allegations of serious incidents are thoroughly and promptly investigated, working in consultation with Risk Management when the incident involves a safety concern.
- Protect the confidentiality of all employees as required by law.
- Develop education and other strategies to prevent serious incidents and assist departments in this process.
- Assure that hiring, promotional, and work assignment decisions are based on knowledge, skills, and abilities; not on personal characteristics that are protected under this policy.

In addition, exit interviews will be conducted by Human Resources and Risk Management, both in-person and electronic, to provide the exiting employee with the opportunity to discuss the reasons for termination, voice any concerns the employee may have been hesitant to bring forward during their employment and provide feedback and suggestions related to their employment.

Chatham County and its Human Resources and Risk Management (HRRM) Department will continue to encourage the employment of women, minorities, and people with disabilities. HRRM will continue to partner with the NC Works division in recruiting and job preparation workshops; participate in job fairs for women and minorities; use recruiting publications/platforms such as *The Chatham News*, ESC (Employment Security Commission) and the UNC-Chapel Hill School of Government and other local professional listservs, professional organizations, and college outreach programs with local colleges and universities such as Central Carolina Community College. A list of posting sites utilized to specifically recruit minorities is included in Appendix A.

### ***Equal Opportunity Employment (EEO) Officer***

The EEO Officer is expected to:

- Developing the day-to-day administration of the EEO Plan.
- Plan, develop, implement, and disseminate EEO policies involving staffing, recruitment, contract compliance and consultant contracts.
- Conduct annual audits of utilization and adverse impact reports to ensure that qualified women and minorities are provided the same opportunities as men and non-minorities.
- Ensure compensation is based on an individual's qualifications and experience.

- Provide training opportunities for elected officials, managers, and employees in the area of EEO and recruitment and selection, to ensure that managers and supervisors understand their responsibility and legal requirements in taking actions to prevent the harassment of employees and applicants for employment.
- Act as the Liaison Officer between the County and regulatory agencies, minority, handicapped and women's organizations and other groups.
- Maintain a process that ensures that individuals in protected classes are informed of employment opportunities within the County and that recruitment sources for protected groups are fully utilized for vacancies.
- Recommend approval or disapproval and signing off on all appointments, promotions, classification changes, etc.
- Provide a system of counseling and resolution for employees or applicants who believe they have been discriminated against as outlined in the Chatham County Harassment and Discrimination Policy and Chatham County Workplace Violence Policy & Procedures.
- Lead the work of the EEO Working Group.

When complaints of harassment and/or discrimination are received, the EEO Officer may delegate the responsibility for investigating those complaints to the Human Resources Director. When complaints of harassment and or discrimination involve the Human Resources and Risk Management (HRRM) Department, the EEO Officer will delegate the responsibility to investigate those complaints to the County Attorney.

### ***EEO Working Group***

The EEO Working Group is expected to:

- Advise and monitor the Chatham County EEO Officer and the Human Resources and Risk Management Department on the implementation of the EEO program.
- Review and recommend changes to the Chatham County EEO Plan and any policies or procedures relating to employment including recruiting, selection, promotions, demotions, etc.
- Along with the EEO Officer, conduct annual audits of utilization and adverse impact reports to ensure that qualified women and minorities are provided the same opportunities as men and non-minorities.
- Reviewing data concerning the composition of the County workforce as it relates to its demographics.
- At least bi-annually, in conjunction with Human Resources and Risk Management, the group will assist departments with auditing their hiring and promotion patterns and training programs to remove barriers to reaching goals and objectives.

***County Manager***

The County Manager is expected to:

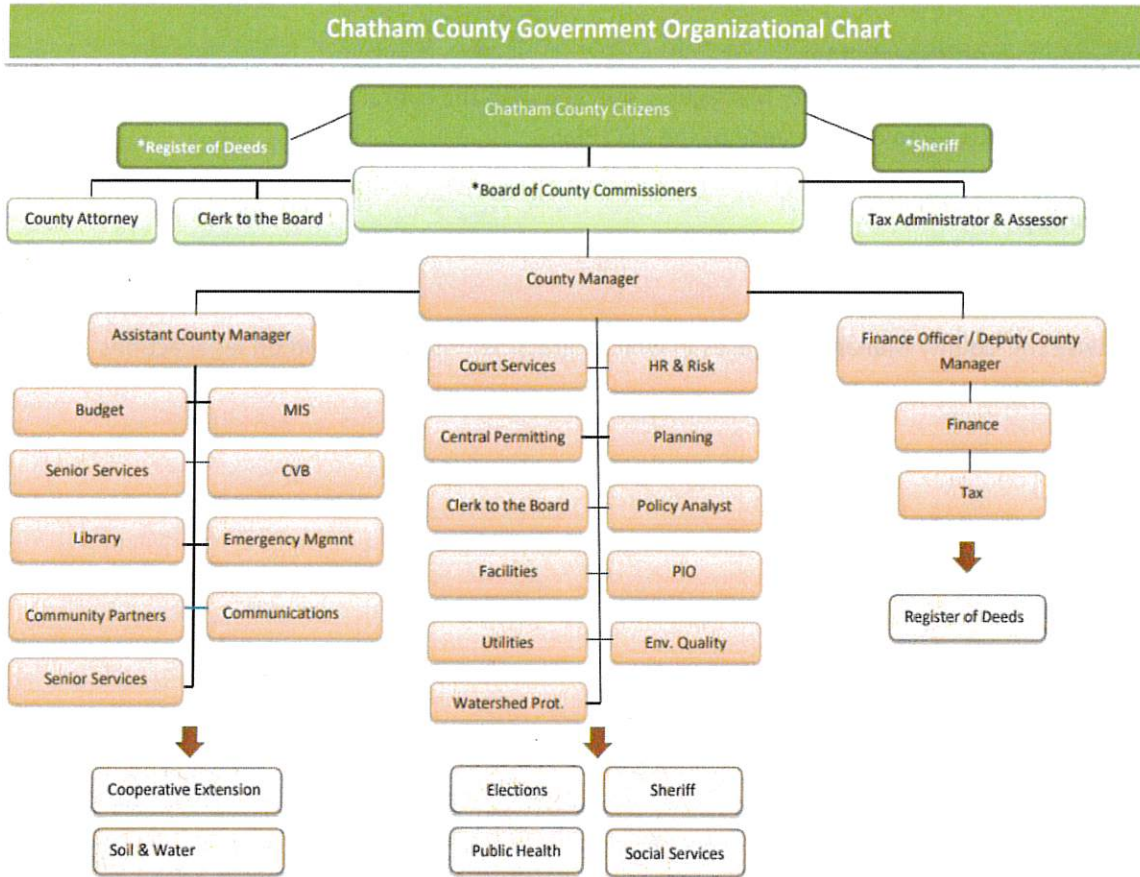
- As chief executive, the County Manager is charged with the overall responsibility for the effective implementation and maintenance of the EEO Plan.

***County Attorney***

The County Attorney is expected to:

- Advise the County Manager on cases in which harassment is alleged and on legal actions arising from these cases.

# Chatham County Organizational Chart



*\*Denotes Position as Elected Official*

*\*Organizational chart subject to change*



## Definitions of Terms – Utilization Analysis

### Definitions – Race/Ethnicity

- **Hispanic or Latino** - A person of Cuban, Mexican, Puerto Rican, South or Central American, or other Spanish culture or origin regardless of race.
- **White (Not Hispanic or Latino)** - A person having origins in any of the original peoples of Europe, the Middle East, or North Africa.
- **Black or African American (Not Hispanic or Latino)** - A person having origins in any of the black racial groups of Africa.
- **Native Hawaiian or Pacific Islander (Not Hispanic or Latino)** - A person having origins in any of the peoples of Hawaii, Guam, Samoa, or other Pacific Islands.
- **Asian (Not Hispanic or Latino)** - A person having origins in any of the original peoples of the Far East, Southeast Asia, or the Indian Subcontinent, including, for example, Cambodia, China, India, Japan, Korea, Malaysia, Pakistan, the Philippine Islands, Thailand, and Vietnam.
- **Native American or Alaska Native (Not Hispanic or Latino)** - A person having origins in any of the original peoples of North and South America (including Central America), and who maintain tribal affiliation or community attachment.
- **Two or More Races (Not Hispanic or Latino)** - All persons who identify with more than one of the above five races.

### Definitions – Job Groups

Although agencies are not limited to using these broad job groups as the only means of analyzing their workforce, we use the following as guidelines:

- **Officials and Administrators:** Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, or direct individual departments or special phases of the agency's operations, or provide specialized consultation on a regional, district or area basis. Includes: department directors, bureau chiefs, division chiefs, directors, deputy directors, controllers, wardens, superintendents, sheriffs, police and fire chiefs and inspectors, examiners (bank, hearing, motor vehicle, warehouse), inspectors (construction, building, safety, rent-and-housing, fire, A.B.C. Board, license, dairy, livestock, transportation), assessors, tax appraisers and investigators, coroners, farm managers, and kindred workers. This includes the following County positions: County Managers, Finance Officer, Health Director, Elections Director, Human Resources and Risk Management Director, Register of Deeds, Sheriff, and Tax Administrator.

- **Professionals:** Occupations which require specialized and theoretical knowledge which is usually acquired through college training or through work experience and other training which provides comparable knowledge. This group includes personnel and labor relations workers, social workers, doctors, psychologists, registered nurses, economists, dietitians, lawyers, systems analysts, accountants, engineers, employment and vocational rehabilitation counselors, teachers or instructors, police and fire captains and lieutenants, librarians, management analysts, airplane pilots and navigators, surveyors and mapping scientists, and kindred workers. This includes the Budget and Health Promotion and Policy Divisions, Social Workers II, III, III IA&T, Clinical Social Workers and Social Worker Supervisor III's, Public Health Nurses, Assistant Finance Officer, Assistant Tax Administrator, Public Information Officer, Clerk to the Board, Domestic Violence Advocate, and Environmental Health Program Specialist and Program Managers.
- **Technicians:** Occupations which require a combination of basic scientific or technical knowledge and manual skill which can be obtained through specialized post-secondary school education or through equivalent on-the-job training. Includes: computer programmers, drafters, survey and mapping technicians, licensed practical nurses, photographers, radio operators, technical illustrators, highway technicians, technicians (medical, dental, electronic, physical sciences), police and fire sergeants, inspectors (production or processing inspectors, testers, and weighers), and kindred workers. This includes all Animal Resources staff (except Officers), Building Inspectors, Watershed Specialists, Land Records Specialist, Medical Lab Technicians, Utilities Foreman and Water Quality Technician.
- **Protective Service Workers:** Occupations in which workers are entrusted with public safety, security, and protection from destructive forces. This Includes police patrol officers, firefighters, guards, deputy sheriffs, bailiffs, correctional officers, detectives, marshals, harbor patrol officers, game and fish wardens, park rangers (except maintenance), and kindred workers. This includes all County law enforcement and detention officers.
- **Paraprofessionals:** Occupations in which workers perform some of the duties of a professional or technician in a supportive role, which usually requires less formal training and/or experience normally required for professional or technical status. Such positions may fall within an identified pattern of staff development and promotion under a "new careers" concept. Includes: library assistants; research assistants; medical aids; child support workers; police auxiliary; welfare service aides; recreation assistants; homemaker aides; home health aides; and kindred workers. This includes County positions such as Accounting Technicians, Administrative Officers, Assistant Register of Deeds, Child Support Agents, Court Related Program Counselors, Income Maintenance Caseworker II's and Supervisors, Library Assistants (except Branch Managers), Paralegals, Revenue Technicians, Tax Appraisers and Telecommunicators.
- **Administrative Support (Including Clerical and Sales):** Occupations in which workers are responsible for internal and external communication, recording and retrieval of data and/or information and other paperwork required in an office. This Includes bookkeepers, messengers, clerk-typist, stenographers, court transcribers, hearing reporters, statistical clerks, dispatchers, license



distributors, payroll clerks, office machine and computer operators, telephone operators, legal assistants, sales workers, cashiers, toll collectors, and kindred workers. This includes County positions such as Income Maintenance Caseworker I's, Interpreters, Processing Assistants, Visitation Supervisors, and all Administrative Support Specialist classes.

- **Skilled Craft Workers:** Occupations in which workers perform jobs which require special manual skill and a thorough and comprehensive knowledge of the process involved in the work which is acquired through on-the-job training and experience or through apprenticeship or other formal training programs. This includes mechanics and repairers' electricians, heavy equipment operators, stationary engineers, skilled machining occupations, carpenters, compositors and typesetters, power plant operators, water and sewage treatment plant operators, and kindred workers. This includes the following County positions: Detention Cook staff including the Kitchen Supervisor, Facilities Manager, Physical Plant Specialist, Utility Service Technicians and Workers and Water Treatment Plant Operators.
- **Service/Maintenance Workers:** Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene, or safety of the general public or which contribute to the upkeep and care of buildings, facilities, or grounds of public property. Workers in this group may operate machinery. Includes: chauffeurs, laundry and dry-cleaning operatives, truck drivers, bus drivers, garage laborers, custodial employees, gardeners, and groundkeepers, refuse collectors, construction laborers, park rangers (maintenance), farm workers (except managers), craft apprentices/trainees/helpers, and kindred workers. This includes the following County positions: Heavy Equipment Operators/Truck Drivers, Facilities Coordinator, Maintenance Technicians, Maintenance Workers, Park Technicians, and the Solid Waste & Recycling Technician.

## Utilization Analysis

The County's workforce is sorted into seven broad categories identified by the Equal Employment Opportunity Commission (EEOC). These include:

- A. Officials/Administrators
- B. Professionals
- C. Technicians
- D. Protective Services: Sworn
- E. Para-Professional
- E. Administrative Support
- F. Skilled Craft Workers
- G. Service/Maintenance Workers

The Relevant Labor Market (RLM) reflects that portion of the labor force within the job recruitment area(s) for Chatham County identified as possessing the requisite knowledge, skills, and abilities for job placement. The chart below provides a summary of the County's 2020 utilization when compared to the workforce in the EEO Tabulation obtained through the US Census Bureau.



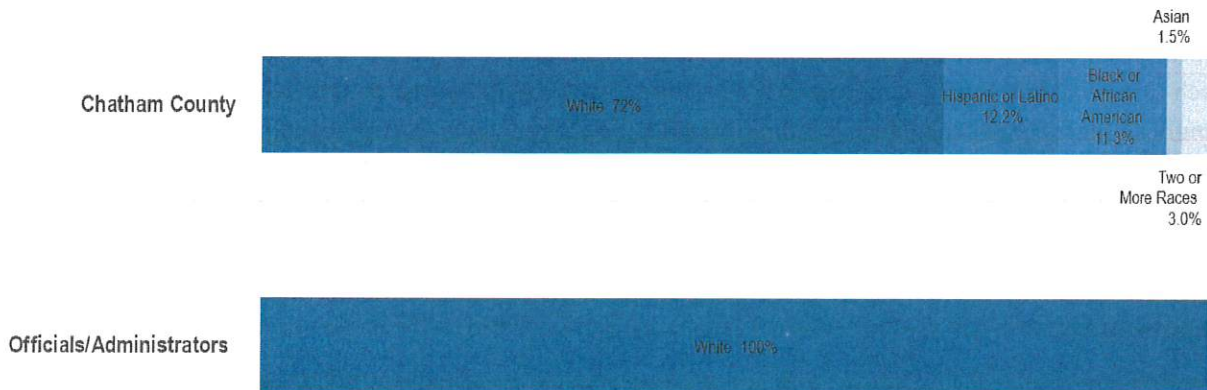
The EEO Working Group reviewed the Utilization Analysis (comparing the County's workforce to the relevant labor market), and noted the following:

- Hispanic, specifically males, were significantly under-represented in the following job categories: Officials/Administrators, Paraprofessionals, Administrative Support, Skilled Craft and Service/Maintenance. As a result, the EEO Working Group plans to increase representation of Hispanic/Latinx employees across the board within the Chatham County organization.*

	Male						
		White	Hispanic or Latino	Black or African American	American Indian or Alaska Native	Asian	Two or More Races
<b>Chatham County</b>		72%	12.2%	11.3%	0.1%	1.5%	3.0%
Officials/Administrators	14	100%	0.0%	0.0%	0.0%	0.0%	0.0%
Professionals	39	91%	0.0%	9.3%	0.0%	0.0%	0.0%
Technicians	9	69%	7.7%	23.1%	0.0%	0.0%	0.0%
Protective Services: Sworn	85	83%	4.9%	8.8%	0.0%	1.0%	2.0%
Para-Professional	17	74%	0.0%	17.4%	4.3%	0.0%	4.3%
Administrative Support	104	87%	2.5%	10.1%	0.0%	0.0%	0.0%
Skilled Craft	13	68%	5.3%	26.3%	0.0%	0.0%	0.0%
Service/Maintenance	33	66%	4.0%	30.0%	0.0%	0.0%	0.0%

- African American males were under-represented in the following categories: Officials/Administrators. As a result, the EEO Working Group plans to increase representation of African American males in the Officials/Administrators job category within the Chatham County organization.*

### Male Officials/Administrators by Race compared to County Population .



- *Hispanic females were not represented in the following job categories: Officials/Administrators.*

## Female Officials/Administrators by Race compared to County Population



For those categories where there is underutilization, the County, led by the EEO Officer and Working Group will undertake a review and establish goals to ensure that these groups are part of the action plan for correction. The EEO Working Group, in conjunction with Human Resources and Risk Management Department, will review the County's employment practices and procedures regularly to determine if they are discriminatory. HRRM, in conjunction with the EEO Officer and EEO Workgroup, will seek ways to eliminate such impact of those categories that are underutilized.

### Goals and Objectives

Chatham County is committed to making its workforce profile more closely reflect the available labor force in our relevant market area. Since Hispanics, who make up for 12.2% of the County's population, were under-represented in all job categories, the County's goal for the next four (4) years is to increase representation in each category by at least one percent (1%) or more. In addition, the goal to increase representation of African American males under the Officials/Administrators job category will start at reaching 1-3% within the next four (4) years. Chatham County will make reasonable efforts to attract qualified female and minority applicants and ensure that no barriers exist that would prevent female and minority employees from equal opportunities in the areas of promotions, transfers, etc.

#### Objective 1

Increase representation of Hispanic/Latinx employees within all job categories the Chatham County organization.

#### Action 1.1



Develop specific outreach plan for the Hispanic/Latinx community included where/how to advertise.

- Begin to utilize diverse job posting sites (see Appendix A) partnering with local community colleges and universities and local historically Black colleges and universities (HBCU's).
- Begin utilizing the local media such as radio and news channels, specifically Hispanic publications and channels.
- Begin partnering with local high school programs and applicable non-profit agencies focused on employment.
- Begin offering targeted low-entry employment opportunities such as internships and temporary/seasonal employment.

## **Objective 2**

Increase representation of African American males in the following job category: Officials/Administrators

### **Action 2.1**

- Begin to utilize diverse job posting sites (see Appendix A) partnering with local historically Black colleges and universities (HBCU's).
- Begin partnering with local high schools and integrate into current programming/events such as AVID.
- Begin offering targeted low-entry employment opportunities such as internships and temporary/seasonal employment.

## **Ongoing Efforts of EEO Working Group**

The EEO Working Group will conduct a more detailed workforce analysis annually to identify County departments, offices, or job positions that represent significant underutilization of males and specifically Black and/or Hispanic males in these categories. The workforce analysis may include interviews with both current and former employees performed by the EEO Officer. Based on the results of the analysis, as well as other data collected, the Chatham County Human Resources and Risk Management will create a recruitment action plan for implementation by the end of the current fiscal year.

In addition, the EEO Working Group, in conjunction with HRRM, will annually review the applicant flow data that it is required to keep under the EEO regulations for all vacancies in the last fiscal year in these job categories to determine whether any step in the selection process for these positions may have had a significant impact on screening out male, and specifically Black and Hispanic male, applicants. The group will produce a written report of its findings; and based on the results, consider modifying its candidate selection process.

Lastly, the EEO Working Group will annually review the composition of the applicant pool for all vacancies in these job categories in the last fiscal year to determine whether males, and specifically African American and Hispanic male, applicants were under-represented. The Group will send a report of all findings, along with relevant observations and recommendations, to the County Manager within six (6) months of the date the data becomes available.

## **Employment Practices**

Chatham County is fully committed to equal employment opportunity (EEO) principles and issues this anti-discrimination/EEO compliance clause to support and maintain employee's rights and responsibilities relating to equal employment. The core of equal employment opportunity is the right to work and advance based on merit, ability, and potential, free from prejudice or discrimination. In accordance with the applicable anti-discrimination statutes, executive orders, and other authorities, Chatham County protects employees against discrimination, to the fullest extent of law, on the basis of race, color, religion, sex (including pregnancy), national origin, sexual orientation, gender identity, age, disability, genetic information, marital status, political affiliation, whistleblower activity, parental status, and military service (past, present, or future), and against retaliation for participation in EEO activity or opposition to discrimination. In support of this commitment, Chatham County Human Resources and Risk Management has developed procedures and timetables for reviewing human resource policies, practices, and procedures to ensure that they provide for careful, thorough, and systematic consideration of the job qualifications of all applicants and employees for job vacancies and available training opportunities.

## ***Recruitment***

The Human Resources and Risk Management Director is responsible for an active recruitment program that meets both current and projected staffing needs. The Director will use procedures to ensure equal employment opportunities based on job-related requirements. Some job groups, such as those with established career progressions programs, rely more heavily than others on internal promotions such as law enforcement, telecommunications and building inspections. However, most job groups are characterized by open and competitive recruitment in which internal candidates are evaluated on an equal footing with external candidates. This openness helps Chatham County attract the best qualified candidates afford women, minorities, and other protected classes more open access to County employment. The procedures include, but are not limited to:

- Posting job announcements on the County's website and social media sources.
- Encouraging employees to refer qualified individuals for openings.
- Using a mix of print and web local advertising resources including, but not limited to, such as *The Chatham News and Record*, indeed.com, LinkedIn, and the University of North Carolina School of Government and other local professional lists serves.
- Continuing to partner with the Employment Security Commission, NC Works, local high schools and Central Carolina Community College and other applicable agencies in recruiting and job preparation workshops.
- Participating in local job and college fairs, especially those targeted at minorities and women.
- Partnering with non-profit and community-based organizations when applicable.

## ***Employment and Selection Procedures***

Per Article IV, Section 2 of the Chatham County Personnel Policy, all department heads and/or hiring managers shall develop, use, and document on a consistent, routine basis, a selection process that best suits the county's needs to fill positions within their agency or department. All selection methods developed and used by the department head shall be valid measures of the required job performance and approved by the Human Resources Director/EEO Officer.

Some of the procedures include, but are not limited to:

- Target areas of underutilization and determine the recruitment efforts that are needed.
- Prior to each new recruitment, review job specifications for updates and revisions to ensure job competencies, knowledge, skills, and abilities are reflective of the current duties of the job.
- Through the use of job analysis, use only questionnaires, assessments (including performance tests), and interview questions that are specifically job-related.
- Maintain the applicant's personal data (i.e., sex, race, age, ethnicity, disability) as confidential information and not disclose to rater during the initial selection process.
- Make every effort to engage a diverse job interview panel and prior to each interview brief its members regarding the appropriate interview structure to maintain an equitable and job-related evaluation of each job candidate.
- In accordance with applicable federal and state laws and regulations, make reasonable accommodations for the physical or mental limitations of an otherwise qualified applicant with disabilities, unless it can be demonstrated that such accommodation would impose an undue hardship on the hiring department's program.
- After each recruitment conduct debriefing sessions to obtain feedback from department screeners, raters and managers and solicit recommendations for process improvement.
- Maintain system that tracks applicant flow through each stage of the recruitment process and produces data on the numbers and percentages for all applicants' race, sex, disability, and national origin.

The full details can be found in the Chatham County Recruitment and Selection Policy. A standard Applicant Ranking Form, Interview Question Template and a Structured Interview Guide for Hiring Managers was created to ensure that Chatham County has a planned and organized recruiting program that assures vacant positions will be filled through open competition, selections procedures are job-related and that all candidates, either internal or external, meet the minimum job requirements.

## ***Training***

Chatham County recognizes the changing training and professional development needs of our employees and is committed to providing opportunities to enhance skills, expand levels of knowledge and explore career paths. Supervisors are expected to encourage employees to take advantage of training and

educational opportunities and to be active in helping employees select courses that will enhance their knowledge, skills, and abilities.

To reach this goal, Chatham County is dedicated to performing the following activities including, but not limited to:

- Chatham County will ensure that all employees attend diversity and harassment training programs.
- Work with departments to ensure that all employees are notified in a timely manner of opportunities for training and career development using various methods of communication.
- With the assistances of department supervisors and managers, maintain records of trainings attended by employees.
- In addition to the mandatory training, provide ongoing training to managers and supervisors in areas such as effective supervision, diversity, inclusion and equity, workplace harassment, generational differences, effective communication, and any other applicable topic areas.

### **Conclusion**

Chatham County is committed to the principles of equal employment opportunity for all its employees and to providing them with a work environment free of discrimination and harassment. All aspects of employment including the decision to hire, promote, discipline, or discharge, will be based on merit, competence, performance, and business needs. Chatham County is dedicated to building an inclusive workplace that values people of all backgrounds and will continue to improve its efforts in recruiting and hiring a more diverse workforce. This policy is subject to change as a result of experience, new information, changes in process requirements, and/or the availability of resources. If you have any questions or concerns, please contact the Chatham County EEO Officer at 919-542-8200.



**Appendix A: Diverse Job Posting Sites**

Name	Organization Type	Platform	Location	Fee
<a href="#">Winston-Salem State University</a>	Historically Black University	Careerlink	Winston-Salem, NC	Unknown
<a href="#">North Carolina A&amp;T State University</a>	Historically Black University	Handshake	Greensboro, NC	Unknown
<a href="#">Emory - Rollins School of Public Health</a>	College/University - Diverse Candidate Outreach	University Website	Atlanta, GA	Unknown
<a href="#">Minorities in Agriculture</a> <a href="#">Natural Resources and</a> <a href="#">Other Related Sciences</a>	Non-profit Organization	Organizational Website	National	\$75+
<a href="#">Nativehire.org</a>	Non-profit Organization - Focus on Native American Candidates	Organizational Website	California/National	Free
<a href="#">Pink Jobs</a>	Non-profit Organization - Focus on LGBTQ Candidates	Organizational Website	National	Free
<a href="#">Professional Diversity Network</a>	Non-profit Organization - 8 Affinity Sites; LGBTQ, LatinX, Black+	Organizational Website	National	Tiered Fee
<a href="#">United Latino Job Bank</a>	Non-Profit Organization - Focus on LatinX Candidates	Organizational Website	National	Free
<a href="#">Hispanic/Latino Professional Association</a>	Non-Profit Organization - Focus on LatinX Candidates	Organizational Website	National	\$199
<a href="#">Handshake</a> *Use for multiple colleges	College/University Recruitment	Organizational Website	National	Free +
<a href="#">Black Career Network</a>	Non-profit Organization	Organizational Website	National	\$50
<a href="#">Bennett College</a>	Historically Black College	Organizational Website	Greensboro, NC	Free

\*\*Handshake colleges and universities include *North Carolina A&T State University, North Carolina Central University, Howard University, UNC-Pembroke, Shaw University, Fayetteville State University and Johnson C. Smith University.*

