

## **La Salle University Equal Employment Opportunity and Anti-Harassment Policy**

All University employees are required to comply with La Salle University's Equal Employment Opportunity and Anti-Harassment Policy (referred to herein as the "Policy").

The Assistant Vice President for Human Resources at the University is responsible for the coordination of the University's efforts to meet its obligations under this Policy. The phone number for the Assistant Vice President of Human Resources is (215) 951-1013.

### **Equal Employment Opportunity Policy**

La Salle University is a diverse community dedicated in the tradition of the Christian Brothers, and is concerned for both the ultimate values and the individual values of its faculty, employees, and students. Accordingly, in support of this values-driven mission, the University is an Equal Opportunity Employer and does not discriminate against any employee or applicant for employment based upon race, color, religion, sex, age (40 years and older), disability, national origin, ancestry, citizenship, sexual preference or orientation, marital status, gender identity, military or veteran status, genetic information, or any prohibited basis, unless there is a bona fide occupational qualification which justifies a differentiation. This commitment applies to all aspects of the employment relationship, including hiring, promotion, compensation, discipline, discharge, and any term or condition of employment and extends to participation in all educational programs and activities of La Salle University. Employment is based upon an applicant's ability to meet the established requirements for employment. All employment decisions will be made in compliance with all applicable federal, state, and local antidiscrimination laws.

In addition, La Salle University will make reasonable accommodation for qualified individuals with disabilities that are known to the University. The University will also make reasonable accommodations to the religious beliefs and practices of which it is aware. The University, however, need not make any accommodation that would cause it an undue hardship.

### **Policy Against Harassment**

La Salle University firmly believes in providing a work place that is free from all forms of harassment and will not tolerate any form of impermissible harassment. Such harassment disregards individual values and impedes the Lasallian mission of providing an educational community that fosters both intellectual and spiritual development. Included in this prohibition are sexual harassment, racial harassment, national origin harassment and harassment based upon ancestry, color, religion, age, disability, citizenship, marital status, gender identity, military or veteran status, sexual preference or orientation, genetic information, or any prohibited basis under applicable non-discrimination laws.

This Policy applies to all employees of La Salle University and applicants for employment at the University and also prohibits discrimination and harassment of employees by any of the University's students, business invitees, or other third parties if such actions relate to an individual's employment at the University. This Policy also prohibits discrimination and

harassment by an employee of students and other non-employees of the University with whom the employee comes into contact in the course of his or her employment.

The following are examples of harassing behavior:

1. unwelcome verbal comments, such as sexual innuendos, suggestive comments, jokes of a racial, sexual, or religious nature, sexual propositions, and threats, including any such comments made through e-mail or through any other electronic means and all other media;
2. non-verbal actions, such as sexual advances, displaying sexually suggestive objects, pictures, calendars, books, or magazines (including any such items depicted on clothing), making suggestive or insulting sounds, leering or ogling in a sexually demeaning way, whistling, or obscene gestures, including any such actions taken through e-mail or through any other electronic means and all other media;
3. unwelcome physical contact, including touching, pinching, bumping or brushing the body, hugging, kissing, pushing, patting, attempted rape or rape;
4. unwelcome verbal comments, name-calling, or symbolic or physical behavior that stigmatizes, insults, victimizes, or persecutes an individual based upon race, national origin, religion, age, disability, or other protected basis;
5. making an employee submit to any of the above types of conduct or similar harassing or discriminatory conduct as an explicit or implicit term or condition of employment;
6. making an employee's submission to or rejection of such conduct or similar harassing or discriminatory conduct as the basis for an employment decision affecting the employee; or
7. directing such conduct at an employee intending to interfere with, or that results in interference with, his or her work performance, or that creates an intimidating, hostile, or offensive work environment.

Other forms of prohibited harassment, although not discussed at length in this Policy, are equally prohibited.

## **Grievance Procedure for Alleged Violations of the University's EEO and Anti-Harassment Policy**

### **Complaints of Discrimination or Harassment**

Any employee or applicant for employment who believes that he or she has been subjected to discrimination or harassment in violation of this Policy or is a witness to such conduct (whether by an employee or non-employee) should report the conduct immediately to his or her supervisor or to the Assistant Vice President for Human Resources. If these individuals are involved in or with the alleged harassment, the complaint may then be made to the University's Affirmative Action Officer. Supervisors and managers who receive a complaint of discrimination or harassment shall inform the Assistant Vice President for Human Resources immediately upon receipt of the complaint. If an employee is unsure as to whether certain conduct constitutes violation of this Policy, but finds the conduct offensive, he or she is urged to make a report of the conduct.

### **Informal Resolution of Complaints**

Except in cases involving alleged sexual assault, if an employee wishes to informally attempt to resolve a problem directly with the individual engaging in the offensive conduct, the employee may approach him or her directly, and tell the individual that the behavior is unwelcome and should stop. The employee also may contact his or her supervisor to facilitate an informal conference to resolve the matter.

Employees are not required or expected to informally resolve the matter, and an employee may end an informal resolution process at any time and instead proceed with a complaint to the Assistant Vice President for Human Resources, as set forth below. If an employee does engage with the individual or his or her supervisor directly, and is not fully satisfied with the response, the employee should contact the Assistant Vice President for Human Resources.

The University may also have an independent obligation to investigate reports of discrimination or harassment in violation of this Policy whether or not they are pursued by an employee under this Policy.

### **Investigation of Complaints**

This Grievance Procedure is intended to provide a prompt and equitable resolution to all complaints of alleged discrimination and harassment. Human Resources will immediately investigate all complaints of alleged discrimination or harassment made to any of the individuals listed above. During the course of the investigation, both parties will have an equal opportunity to identify witnesses and other evidence to the investigator(s). Human Resources shall have a goal of completing any such investigation within sixty (60) days of notice of the complaint. If, due to the complexity of the investigation, the nature of the allegations, or other unforeseen circumstances, the investigation may take longer than the time frame provided above, Human Resources shall inform the complainant and the person alleged to be in violation of this Policy

(the “respondent”) of the need for additional time to complete the investigation and the anticipated completion date.

Within two (2) weeks of the completion of the investigation, the investigator(s), the Assistant Vice President for Human Resources, and the employee’s Area Vice President will review the results of the investigation, determine whether any employee discipline is warranted or other remedial measures should be taken based on the results of the investigation, and issue written notice to the complainant and the respondent regarding the results of the investigation.

### Confidentiality Concerns

The existence and nature of any complaint or report of discrimination or harassment in violation of this Policy will be disclosed only to the extent necessary to effectively investigate or to take the appropriate remedial conduct. While Human Resources will conduct the investigation in as confidential manner as is reasonably possible, the University cannot guarantee confidentiality in its investigation. Participants in the investigation may be instructed to keep the investigation confidential, and may be subject to discipline for failing to do so.

### Prohibition of Retaliation

No employee will be subject to any form of retaliation or discipline for making a good faith complaint or report under this Policy, supporting a complaint or report under this Policy, providing information (including acting as a witness) concerning any complaint or report under this Policy, or otherwise properly opposing prohibited discrimination or harassment in the workplace. If an employee believes that he or she has been retaliated against in any way, he or she should report it to the Assistant Vice President of Human Resources. Retaliation will be cause for appropriate discipline, up to and including discharge.

### Sanctions for Violations of the Policy

If an investigation of a reported or suspected incident of discrimination or harassment supports the claim of discrimination or harassment by a preponderance of the evidence, La Salle University will take appropriate, prompt, and effective remedial action to halt the conduct, to correct the discriminatory effects of such conduct on the complaining party and any others affected, and to prevent the recurrence of such conduct. The University also will take appropriate disciplinary action, up to and including discharge. The conduct warranting discipline or discharge need not constitute unlawful activity if La Salle University concludes such conduct is contrary to the best interests of the University.