



<b>Policy Name:</b>	<b>Effective Date:</b>	<b>Policy “owner” (department):</b>
Equal Employment Opportunity/EEO, Non-Discrimination and Diversity	July 1, 2015; Revised 11/15/16	Human Resources

**Objective/Purpose**

To provide managers and supervisors information and guidelines as they relate to Developmental Pathways’ (often referred to as Pathways or DP) policies governing Equal Employment Opportunity and Anti-Discrimination.

**Definitions**

- **Equal Employment Opportunity** – The provision and application of fair employment practices regardless of an individual’s race, color, religion, sex, national origin, age, disability, genetic history, gender identity or expression or veteran status.
- **Affirmative Action** – The act of taking positive action to ensure that employment activity results in the inclusion of all individuals, regardless of their protected status.
- **Americans With Disabilities Act** – Legislation passed in 1990 providing certain protections to individuals with disabilities, as defined by the Act.
- **Non-Discrimination** – The act of assuring that all employment practices are provided fairly and without regard to an individual’s race, color, religion, sex, national origin, age, disability, genetic history, gender identity or expression or veteran status.
- **Diversity** – The inclusion of different types of people (as in people of different races or cultures) in a group or organization.

**Policy**

Developmental Pathways promotes equal opportunity throughout its programs and activities, and is committed to ensuring opportunities at all levels of employment and to increasing and encouraging participation in programs and activities by all employees without regard to race, color, religion, national origin or ancestry, sex, gender identity or expression, age, physical and/or mental abilities, veteran status, marital status, sexual orientation, genetic information, socio-economic status, pregnancy related conditions, or any other status protected by applicable law.

Developmental Pathways complies with applicable federal, state and local laws, rules and regulations that prohibit discrimination against qualified individuals, to include the Americans with Disabilities Act. Developmental Pathways agrees to provide reasonable accommodations to qualified individuals so long as the accommodation does not result in an undue hardship for the organization and enables employees to perform their respective jobs in a safe manner. Developmental Pathways complies with all federal



and state anti-discrimination laws and bases its determinations about employment, training, compensation and promotions on job-related qualifications in compliance with Equal Employment Opportunity and employment anti-discrimination laws which prohibit discrimination and/or unfair employment practices.

Developmental Pathways expects and encourages employees to respect the individual rights and privacy of others. Each employee is to treat others equally and with respect. Intimidating, harassing or abusing clients, their families, guardians, coworkers, subordinates, contractors or others because of a protected status is prohibited. Developmental Pathways has a no-tolerance policy prohibiting discrimination of any kind and/or for any reason.

Developmental Pathways is committed to fostering, cultivating and preserving a culture of diversity and inclusion. Our human capital is the most valuable asset we have. The collective sum of the individual differences, life experiences, knowledge, inventiveness, innovation, self-expression, unique capabilities and talent that our employees bring to the work place represents a significant part of not only our culture, but our reputation and company's achievement as well.

The policy of equal employment opportunity and anti-discrimination applies to all aspects of the relationship between Developmental Pathways and its employees, including but not limited to:

- Recruitment
- Employment
- Promotion
- Position Transfers
- Training
- Working conditions
- Social activities and events
- Wages and salary administration
- Employee benefits and application of policies

The policies and principles of equal employment opportunity also apply to the selection and treatment of independent contractors; to individuals employed at Developmental Pathways who are working on our premises, who are in temporary positions, or who are employed by temporary agencies; and any other individuals, companies, agencies or organizations doing business for or with Developmental Pathways.

Directors, managers and supervisors are responsible for implementing equal employment practices within each department and program. The Human Resources Department is also responsible for the Company's overall compliance, and is responsible for maintaining personnel/employment records in compliance with applicable laws and regulations.



### **Related Procedures**

In support of this Policy, Developmental Pathways has taken the following actions:

- Employees, upon hire, are provided an Employee Guidebook that explains Developmental Pathways' Policy on Equal Employment Opportunity and Anti-Discrimination.
- Updated State and Federal compliance posters affirming Equal Employment Opportunity are present and highly visible to employees throughout DP's buildings and programs.
- Employees are encouraged to report any problems or concerns regarding Equal Employment Opportunity and Non-Discrimination to management for their information and follow-up. The report should be made within forty-eight hours of the incident.
- Employees have access to the EEO/Anti-Discrimination policy and the Employee Guidebook by means of the organizations Intranet and are required to review this policy on an annual basis.

Applicants and Employees are not to be subjected to harassment, intimidation or any type of retaliation because they have filed a complaint, assisted or participated in an investigation, compliance review, hearing or any other activity related to the administration of any federal, state or local law requiring equal employment opportunity; for opposing any act or practice that is unlawful by any federal, state or local law requiring equal opportunity; or for exercising any other legal right protected by federal, state or local law requiring equal opportunity.

Developmental Pathways periodically brings these appropriate policies to the attention of managers, supervisors and directors who are charged with assuring that guidelines are followed and directives are appropriately administered. Additionally, all employees are expected to recognize these policies and follow through with established protocols. Violation of these policies may result in corrective action, up to and including termination of employment.

Developmental Pathways will promptly and thoroughly investigate every issue that is brought to its attention in this area and will take appropriate corrective action, up to and including termination of employment. An employee's issues or concerns about equal opportunity employment and/or discrimination are to be directed to their supervisor, manager, department director, or to Human Resources. Any questions, concerns or complaints of discrimination are to be brought to the attention of the Human Resources EEO Compliance Officer, Tina Baker-Squier (Associate Director of Human Resources) at (303) 858-2117 or [t.baker-squier@nmscolo.org](mailto:t.baker-squier@nmscolo.org), located at the Inverness Office.

As appropriate, Human Resources is responsible for notifying corporate counsel when a claim of discrimination or harassment is received.