



**CITY OF CORONA  
EQUAL  
EMPLOYMENT  
OPPORTUNITY  
PLAN**

**2022-2026 PLAN**

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## PURPOSE

The purpose of the City of Corona ("the City") Equal Employment Opportunity Plan ("EEO") is to support the City's commitment to equal employment opportunity for all covered employees to all terms of employment with the City, including compensation, hiring, training, promotion, transfer, discipline, termination and to prevent discrimination, harassment, and retaliation in its employment policies, practices, and program operations. In addition, the EEO will serve as a plan of action and a reference resource. The EEO is intended to:

**Reaffirm** the City's commitment to equal employment opportunity("EEO") in our employment practices.

**Outline** the City's efforts to:

- Attract and retain a diverse workforce that reflects community demographics.
- Increase the pool of qualified diverse applicants, particularly for job categories or areas that are underrepresented.
- Promote a workplace environment that is free from all forms of unlawful discrimination, harassment, and retaliation based on race, religion, color, national origin, ancestry, physical disability, mental disability, medical condition, genetic information, marital status, sex, gender, gender identity, gender expression, pregnancy status, age (40 and over), sexual orientation, or military and veteran status or any other basis protected by law.
- Provide opportunities for professional development and advancement for all employees and identify barriers and challenges to Diversity, Equity, Inclusion and Belonging ("DEIB") and develop ways to reduce or remove barriers.
- Increase DEIB efforts among employees to promote a kind, welcoming and productive workforce that responds to the needs of a diverse community.

**Recognize** the City's workforce is enhanced by fostering and supporting DEIB programs.

# RESPONSIBILITIES

The City's commitment to equal opportunity requires the support of City Leadership, Managers, Supervisors, and front line employees. Employees at all levels play a vital role in ensuring the success of the EEOP. The following outlines roles and responsibilities:

## 1. City Manager

The City Manager is responsible for providing executive leadership and oversight to ensure that department heads act strive to achieve and implement the City's goals, plans, and objectives related to equal employment opportunity by:

- Ensuring Department Heads to incorporate equity considerations in performance measures and goals to meet the needs of all groups within the community and workforce, including underrepresented groups.
- Ensuring that all staff understand and work within Federal and State laws and City policies regarding equal employment opportunity.
- Communicating and providing leadership support to reiterate the City's commitment to equal employment opportunities at all levels and create a diverse and inclusive workforce that reflects the community.

## 2. City Attorney

The City Attorney is responsible for handling all actions and proceedings in which the City may have a legal interest. As such, complaints of discrimination and non-compliance, which are served upon the City by external agencies, shall be referred to the Legal & Risk Management Department for legal advice and appropriate action.

## 3. Chief Talent Officer

The Chief Talent officer is responsible for the daily administration, maintenance, and implementation of the EEOP, reviewing personnel policies, employment practices and procedures, and making improvements or recommendations on steps to promote equal employment opportunity by:

### A. Hiring/Promotion/Recruitment

- Partnering with City Departments to ensure that hiring and recruitment practices are based on merit and are in accordance with equal employment opportunity laws.
- Increasing efforts to attract a diverse candidate pool for positions in all categories including underrepresented groups, to maintain a workforce reflective of the community it serves.
- Reviewing qualifications for positions to ensure they are job-related and consistent with equal employment opportunities for all applicants and employees.
- Identifying areas of improvement and removing potential barriers in recruitment and promotions.
- Ensuring equal employment opportunity policies and procedures comply with current laws.

#### **B. Training/Organizational Development**

- Develop tools, guidance, and training to create awareness, promote equal employment opportunities, and reduce implicit bias in the hiring process.
- Conduct training regarding workplace discrimination, harassment, retaliation, diversity, equity, inclusion, and belonging.
- Investigating and resolving complaints of alleged discrimination, harassment, or retaliation.

#### **4. Department Heads**

Department Heads are responsible for ensuring that their departments adhere to equal employment opportunity policies when hiring, promoting and retaining employees. Department heads are expected to foster a work environment free of unlawful discrimination, harassment, and retaliation. They are responsible for making progress toward advancing equal employment opportunity by:

- Ensuring all employment decisions, including interviews, offers of employment and compensation commitments, training, development of job-related knowledge, skills, and abilities, evaluation, and employee relations, are consistent with the City's personnel policies and equal employment opportunity laws.
- Respond to the needs of an increasingly diverse workforce by developing and implementing procedures that foster an inclusive and productive workplace.
- Prevent, report, and address any potential discrimination, harassment, and retaliation complaints.

#### **5. All City Employees**

All City employees (managers, supervisors, and staff employees) are responsible for:

- Fostering a work environment that is conducive to achieving equal employment opportunities and that is free of any form of unlawful discrimination, harassment, and retaliation.
- Treating all individuals in the workplace or on City worksites with respect.
- Modeling behavior that conforms to this policy.
- Participating in periodic trainings on the City's EEOP policies and other related topics.
- Cooperating with City's EEOP investigations by responding fully and truthfully and in a timely manner to all questions posed during the investigation.
- Reporting any act, they believe in good faith constitutes harassment, discrimination or retaliation as defined in this policy, to their immediate supervisor, manager, Department Head, or Human Resources.

# THE CITY OF CORONA WORKFORCE

Under federal law, the City as an employer must provide equal employment opportunity to all job applicants and employees. Employers ensure that this requirement is met by analyzing workforce demographics, identifying groups that have significant lower representation or “underutilization”, and revising personnel practices to eliminate potential discriminatory and non-job-related employment barriers.

## I. EEO Occupational Job Categories

The City’s workforce is divided into the following eight occupational job categories, as defined by the U.S Equal Employment Opportunity Commission<sup>1</sup>

**Officials/Administrators:** Occupations in which employees set broad policies, exercise overall responsibility for execution of these policies, direct individual departments or special phases of the agency’s operations, or provide specialized consultation on a regional, district or area basis. Includes: department heads, bureau chiefs, division chiefs, directors, deputy directors, controllers, wardens, superintendents, sheriffs, police and fire chiefs and inspectors, (construction, building, safety, rent and housing, and fire) and kindred workers.

**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. Includes: personnel and labor relations workers, social workers, economists, lawyers, systems analysts, accountants, engineers, employment and vocational rehabilitation counselors, teachers or instructors, police and fire captains and lieutenants, librarians, management analysts, surveyors, mapping scientists and kindred workers.

**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, photographers, radio operators, technical illustrators, highway technicians, police and fire sergeants, inspectors (production or processing inspectors, testers, and weighers), and kindred workers.

**Protective Service:** Occupations in which workers are entrusted with public safety, security, and protection from destructive forces. Includes: police patrol officers, firefighters, guards, deputy sheriffs, bailiffs, correctional officers, detectives, marshals, park rangers (except maintenance), and kindred workers.

**Paraprofessionals:** Occupations in which workers perform some of the duties of a professional or technician in a supportive role, which usually require 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. Included: research

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<sup>1</sup> Relevant City of Corona Categories based on the 2021 Equal Employment Opportunity EEO-4 instruction Booklet.



assistants, child support workers, policy auxiliary welfare service aides, recreation assistants, library assistants and clerks, ambulance drivers and attendants, and kindred workers.

**Administrative Support:** 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. Includes: bookkeepers, messengers, clerk typists, stenographers, hearing reporters, statistical clerks, dispatchers, payroll clerks, office machine and computer operators, telephone operators, legal assistants, cashiers, and kindred workers.

**Skilled Craft:** 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. Includes: mechanics and repairers, electricians, heavy equipment operators, stationary engineers, skilled machining occupations, carpenter, power plant operators, water and sewage treatment plant operators, and kindred workers.

**Service - Maintenance:** Occupations in which workers perform duties which result in or contribute to the comfort, convenience, hygiene, or safety of the 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: truck drivers, bus drivers, garage laborers, custodial employees, gardeners, and groundskeepers, refuse collectors, construction laborers, park rangers (maintenance), craft apprentices/trainees/helpers, and kindred workers.

## II. Race/Ethnic Identification

The City of Corona is required by federal law to maintain employee demographic information and report it biennially to the United States Equal Employment Opportunity Commission (EEOC). Race/ethnic designations, as defined by the Equal Employment Opportunity Commission, do not denote scientific definitions of anthropological origins.

For the purposes of this report, an employee is included in the group to which he or she self-identifies. No employee is counted in more than one race group. The ethnic categories used by the City are similar to those defined by the U.S. Equal Employment Opportunity Commission:

**White (Not of Hispanic Origin):** All persons having origins in any of the original peoples of Europe, North Africa, or the Middle East.

**Black (Not of Hispanic Origin):** All persons having origins in any of the Black racial groups of Africa.

**Asian (Not of Hispanic Origin):** All persons having origins in any of the original peoples of the Far East, Southeast Asia, the Indian Subcontinent, or the Pacific Islands. This area includes for example, China, India, Japan, Korea, the Philippine Islands, and Samoa.

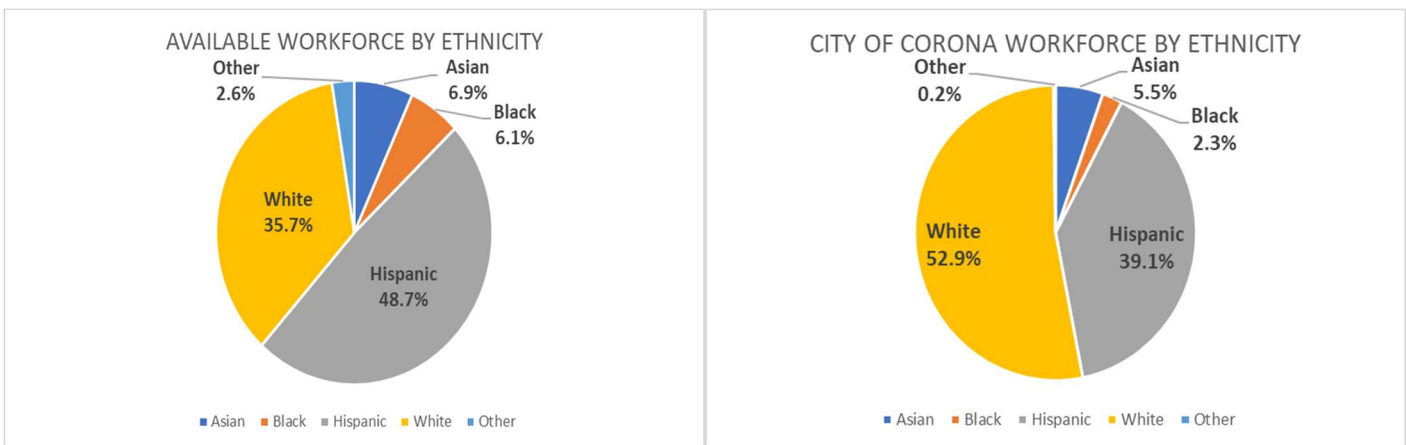
**Other (Not of Hispanic Origin):** All persons not having origins in White, Black, Asian, or Latino descent.

**Latino/a (Hispanic):** All persons of Mexican, Puerto Rican, Cuban, Central or South American, or other Spanish culture or origin regardless of race.

### III. Workforce Analysis

The data in this plan represents an analysis of the ethnicity and gender of the City's workforce in 2021. The City's workforce includes 823 employees and is distributed among 12 departments. This section also identifies over- and under-represented groups by occupational job category. Summary:

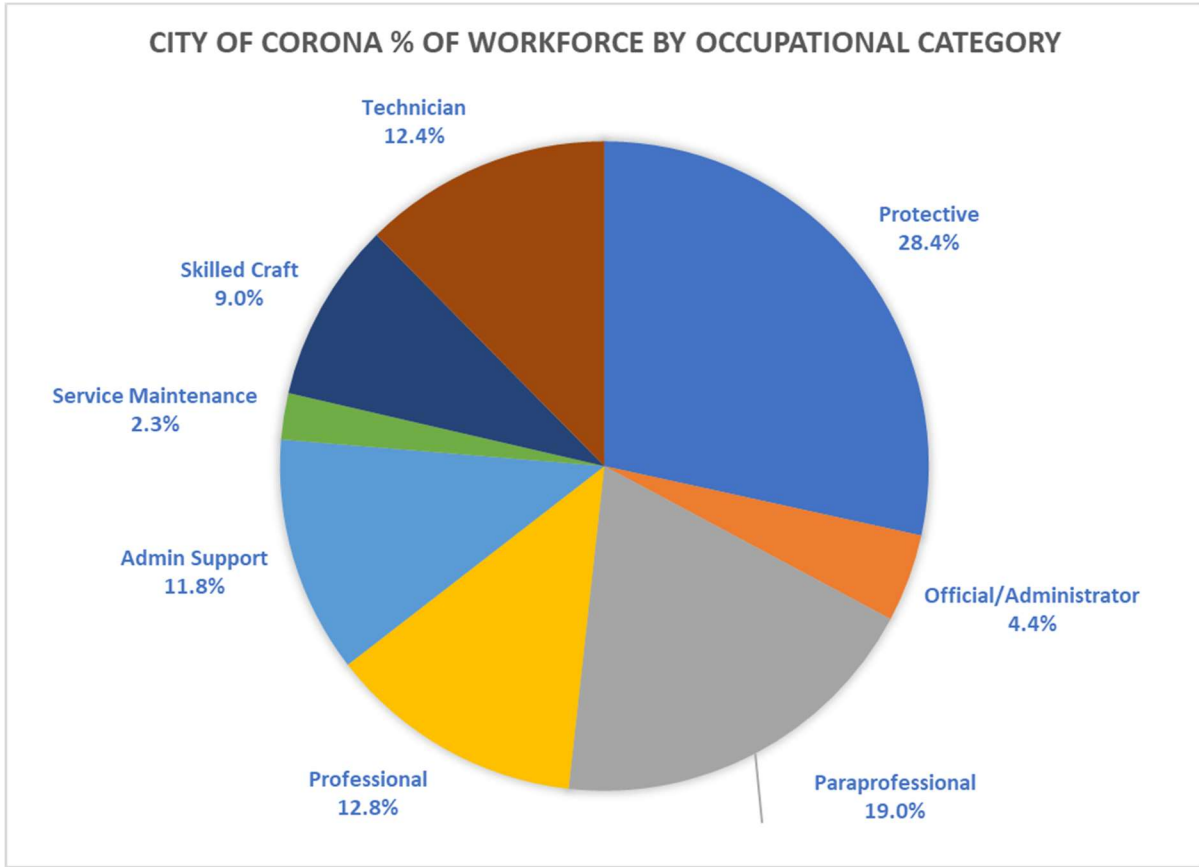
- The City of Corona's non-white workforce comprises of 47.1% of the total workforce, with Asian (5.5%), Hispanic or Latino (39.1%), Black or African American (2.3%), and Other (0.2%) employees. White staff members represent 52.9% of the City's total workforce.



- The City of Corona's employee representation is below the Citywide available workforce for the following employee groups: Hispanic or Latino, Black or African American, Asian, and Other Non-White Ethnicities.



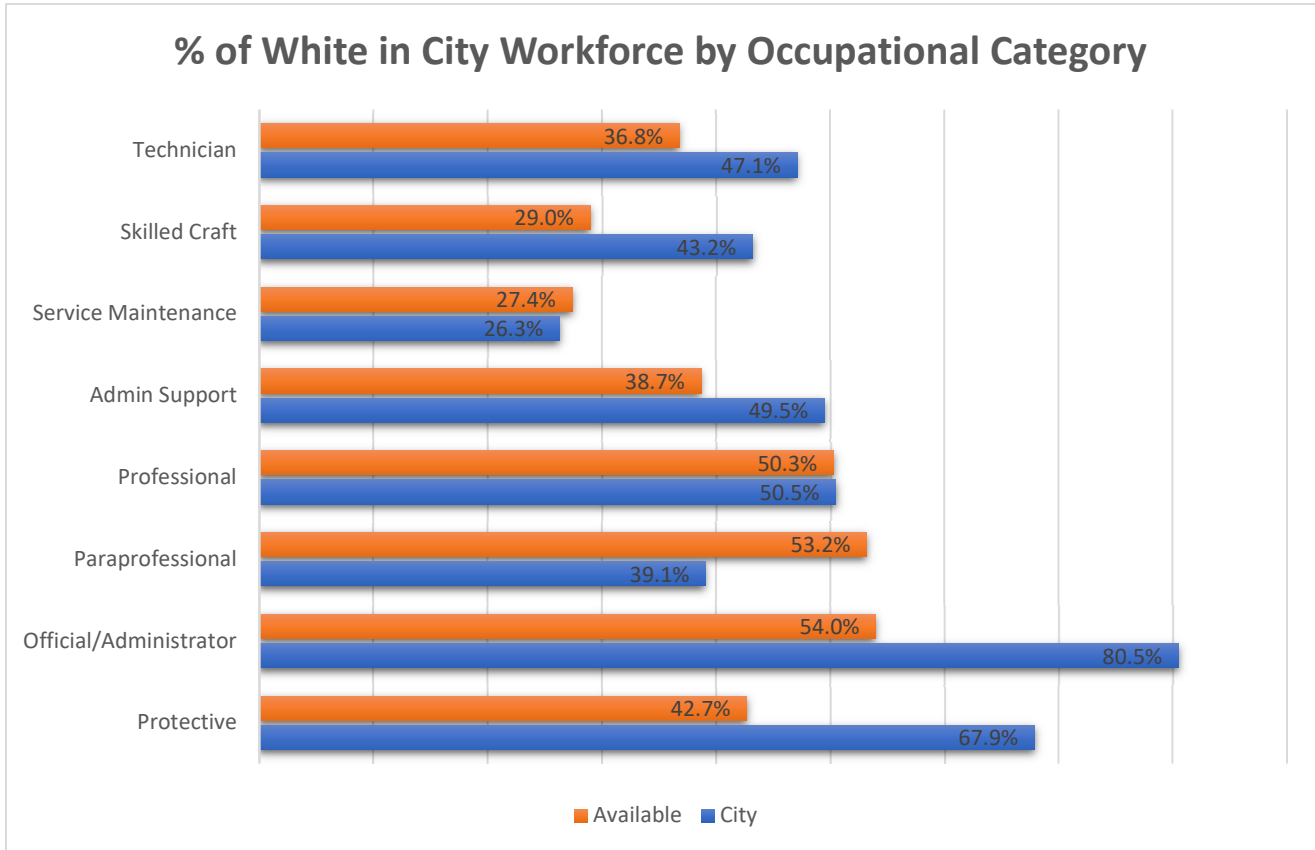
The City of Corona's workforce is divided into Occupational Categories as defined by the Equal Employment Opportunity Commission. The City's Occupational Categories are made up of 28.4% Protective Services, 19.0% Paraprofessional, 12.8% Professionals, 11.8% Administrative Support, 12.4% Technicians, 9.0% Skilled Craft, 4.4% Officials/Administrators and 2.3% Service Maintenance.



For each of these Occupational Group's the City's demographics are as follows:

## SUMMARY OF WHITE WORKFORCE

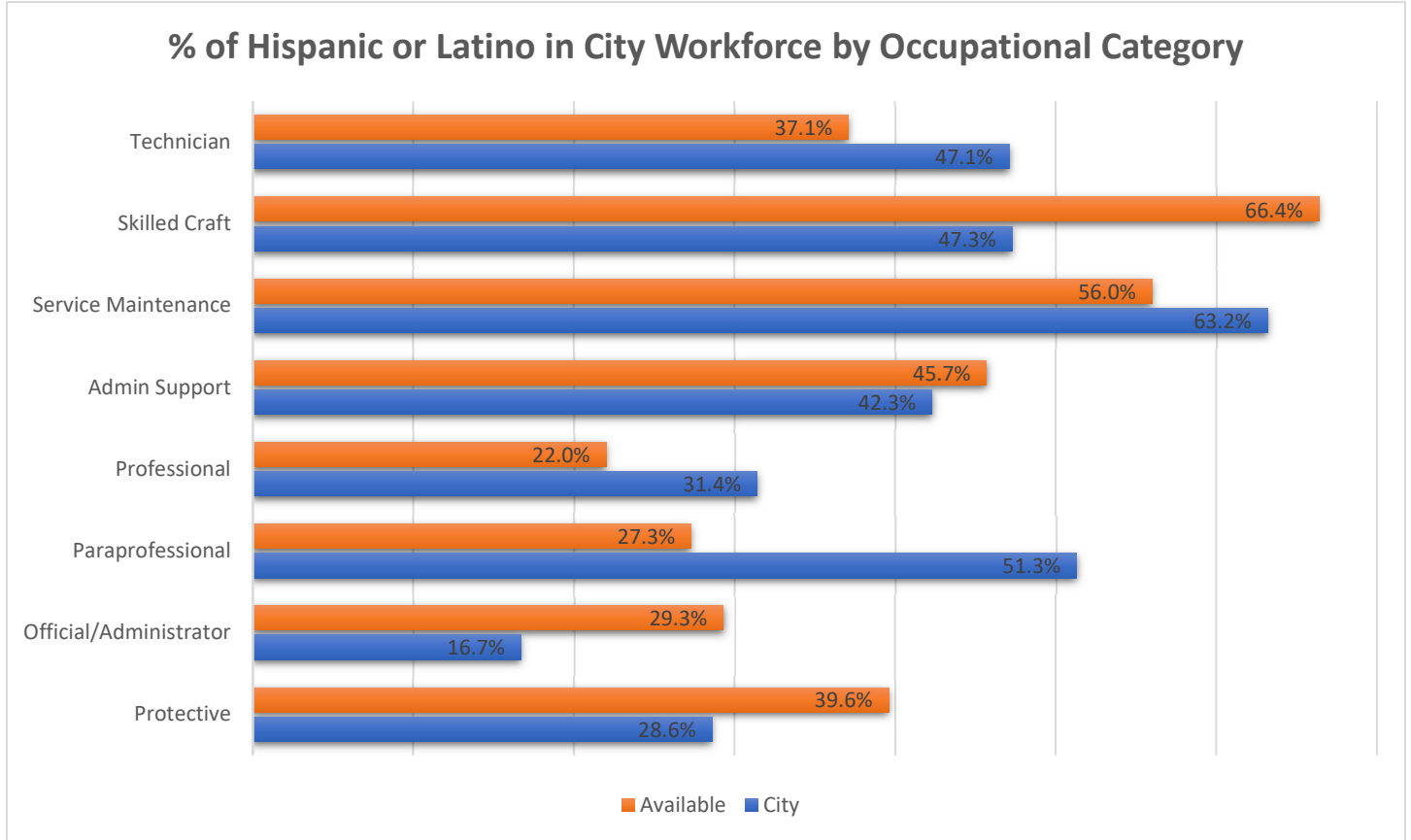
The City of Corona's White Workforce comprises 26.3% of Service Maintenance, 43.2% of Skilled Craft, 49.5% of Administrative Support, 39.1% Paraprofessional, 67.9% of Protective Services, 47.1% Technicians, 50.5% Professionals, and 80.5% of Officials/Administrators.



- Representation in the City workforce is roughly equal to (+/-2%) available workforce in the following occupational categories:
  - Professional
  - Service Maintenance
- Representation in the City workforce exceeds available workforce in the following occupational categories:
  - Official/Administrator (26.5%)
  - Protective (25.2%)
  - Skilled Craft (14.2%)
  - Admin Support (10.8%)
  - Technician (10.3%)
- Representation in the City workforce is *under-represented* in the following occupational categories:
  - Paraprofessional (-14.1%)

## SUMMARY OF HISPANIC OR LATINO WORKFORCE

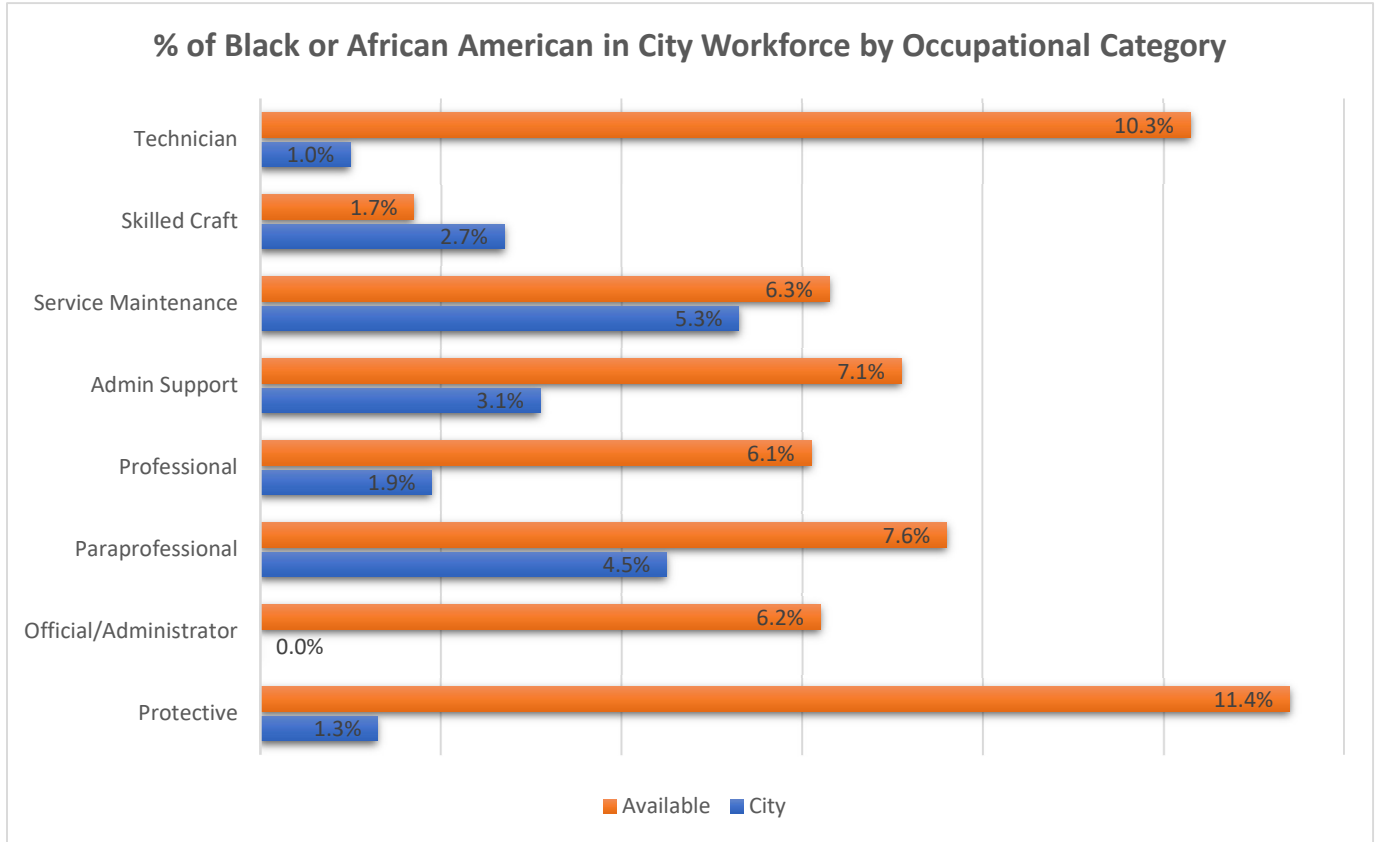
The City of Corona's Hispanic or Latino workforce comprises 63.2% of Service Maintenance, 47.3% Skilled Craft, 42.3% Administrative Support, 51.3% Paraprofessional, 28.6% Protective Services, 47.1% Technicians, 31.4% Professionals, 16.7% Officials/Administrators.



- Representation in the City workforce is roughly equal to (+/-2%) available workforce in the following occupational categories:
  - None
- Representation in the City workforce exceeds available workforce in the following occupational categories:
  - Paraprofessional (24%)
  - Technician (10%)
  - Professional (9.4%)
  - Service Maintenance (7.2%)
- Representation in the City workforce is *under-represented* in the following occupational categories:
  - Skilled Craft (-19.1%)
  - Official/Administrator (-12.6%)
  - Protective (-11%)
  - Admin Support (-3.4%)

## SUMMARY OF BLACK OR AFRICIAN AMERICAN WORKFORCE

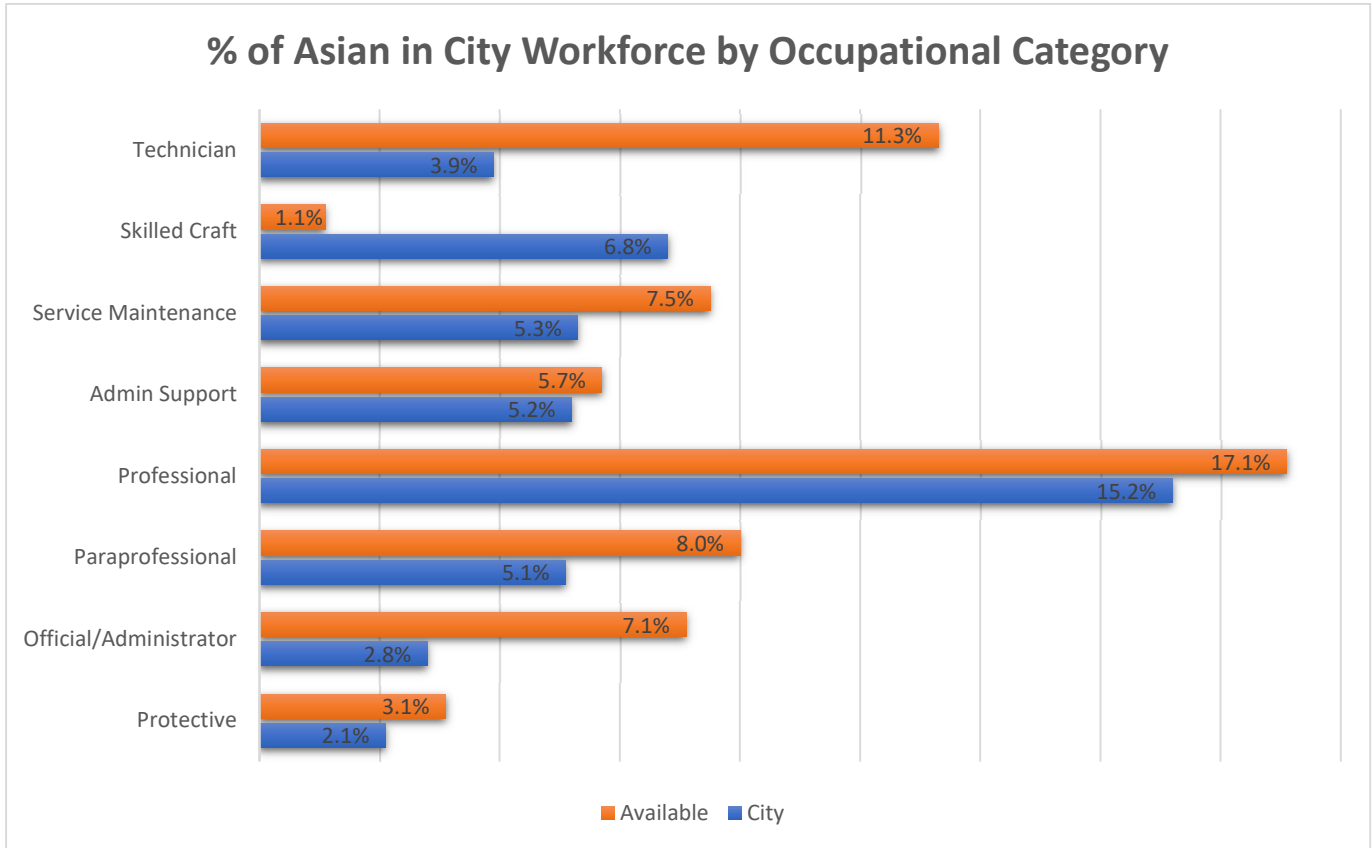
The City of Corona's Black or African American workforce comprises 5.3% of Service Maintenance, 2.7% Skilled Craft, 3.1% Administrative Support, 4.5% Paraprofessional, 1.3% Protective Services, 1.0% Technicians, 1.9% Professionals, 0% Officials/Administrators.



- Representation in the City workforce is roughly equal to (+/-2%) available workforce in the following occupational categories:
  - Skilled Craft
  - Service Maintenance
- Representation in the City workforce exceeds available workforce in the following occupational categories:
  - None
- Representation in the City workforce is *under-represented* in the following occupational categories:
  - Protective (-10.1%)
  - Technician (-9.3%)
  - Official/Administrator (-6.2%)
  - Professional (-4.2%)
  - Admin Support (-4%)
  - Paraprofessional (-3.1%)

## SUMMARY OF ASIAN WORKFORCE

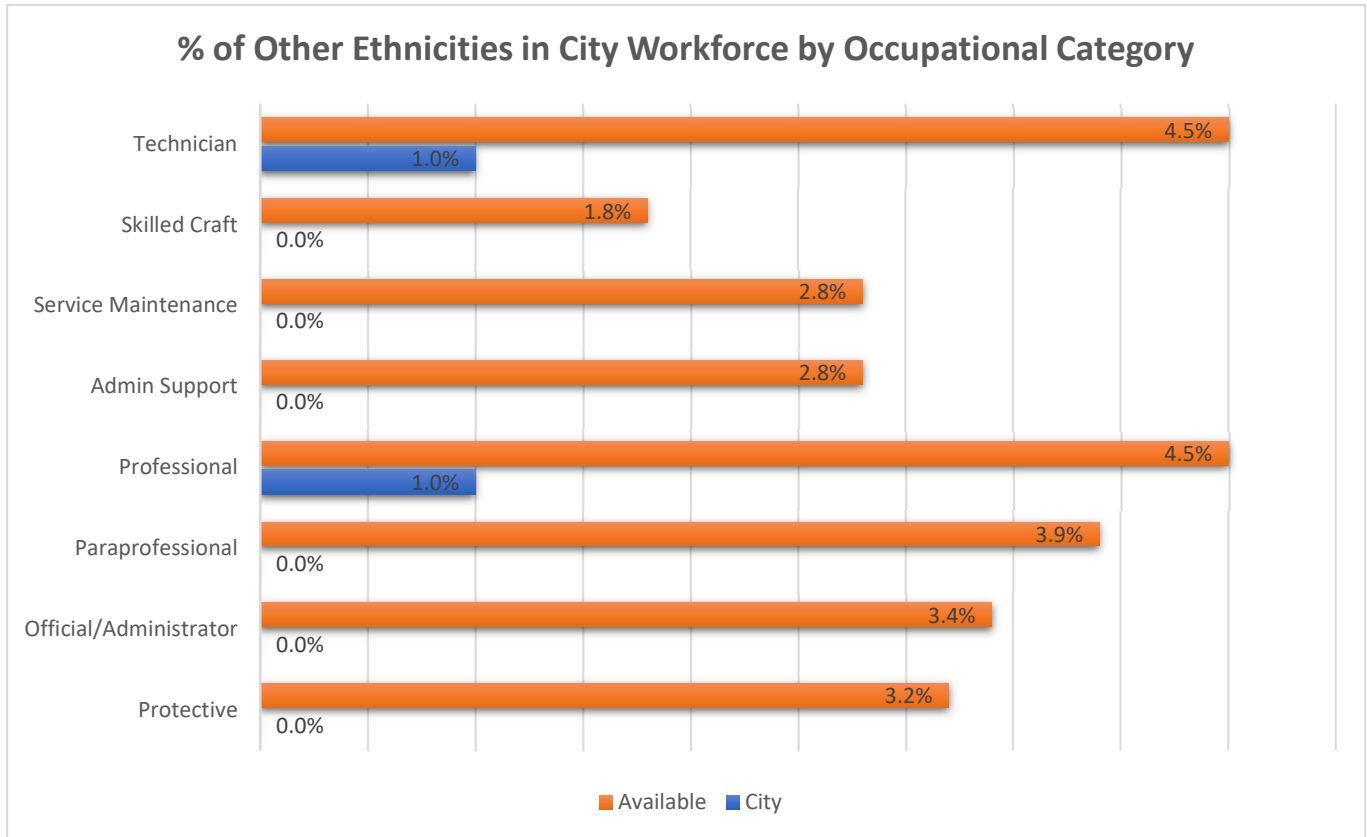
The City of Corona's Asian workforce comprises 5.3% of Service Maintenance, 6.8% Skilled Craft, 5.2% Administrative Support, 5.1% Paraprofessional, 2.1% Protective Services, 3.9% Technicians, 15.2% Professionals, 2.8% Officials/Administrators.



- Representation in the City workforce is roughly equal to (+/-2%) available workforce in the following occupational categories:
  - Protective
  - Admin Support
  - Professional
- Representation in the City workforce exceeds available workforce in the following occupational categories:
  - Skilled Craft (5.7%)
- Representation in the City workforce is *under-represented* in the following occupational categories:
  - Technician (-7.4%)
  - Paraprofessional (-2.9%)
  - Official/Administrator (-4.3%)
  - Service Maintenance (-2.2%)

## SUMMARY OF OTHER ETHNICITIES WORKFORCE

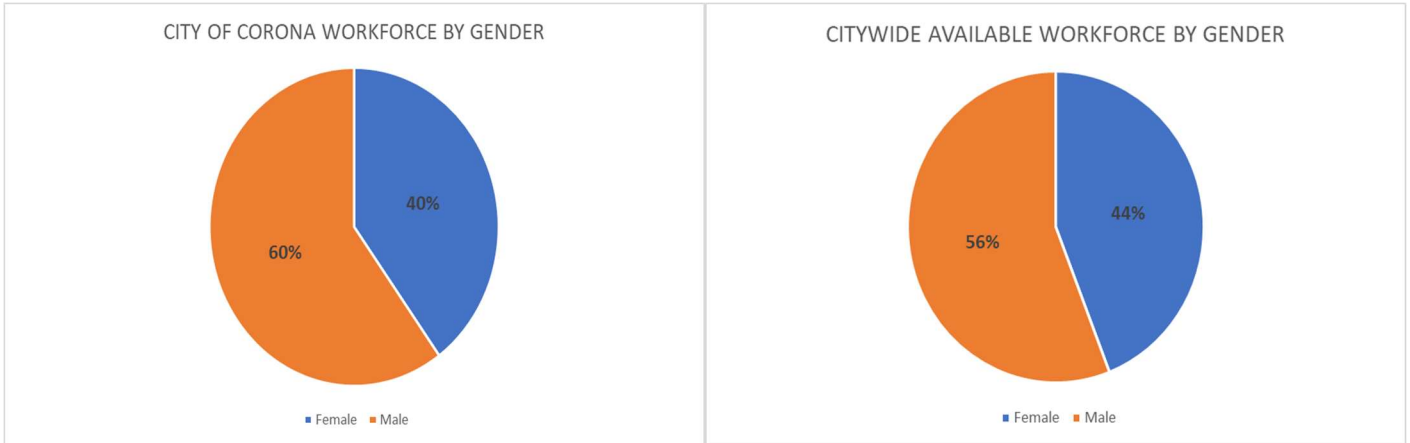
The City of Corona's Other Ethnicities workforce comprises 0% of Service Maintenance, 0% Skilled Craft, 0% Administrative Support, 0% Paraprofessional, 0% Protective Services, 1.0% Technicians, 1.0% Professionals and 0% Officials/Administrators.



- Representation in the City workforce is roughly equal to (+/-2%) available workforce in the following occupational categories:
  - Skilled Craft
- Representation in the City workforce exceeds available workforce in the following occupational categories:
  - None
- Representation in the City workforce is *under-represented* in the following occupational categories:
  - Paraprofessional (-3.9%)
  - Technician (-3.5%)
  - Professional (-3.5%)
  - Official/Administrator (-3.4%)
  - Protective (-3.2%)
  - Service Maintenance (-2.8%)
  - Admin Support (-2.8%)

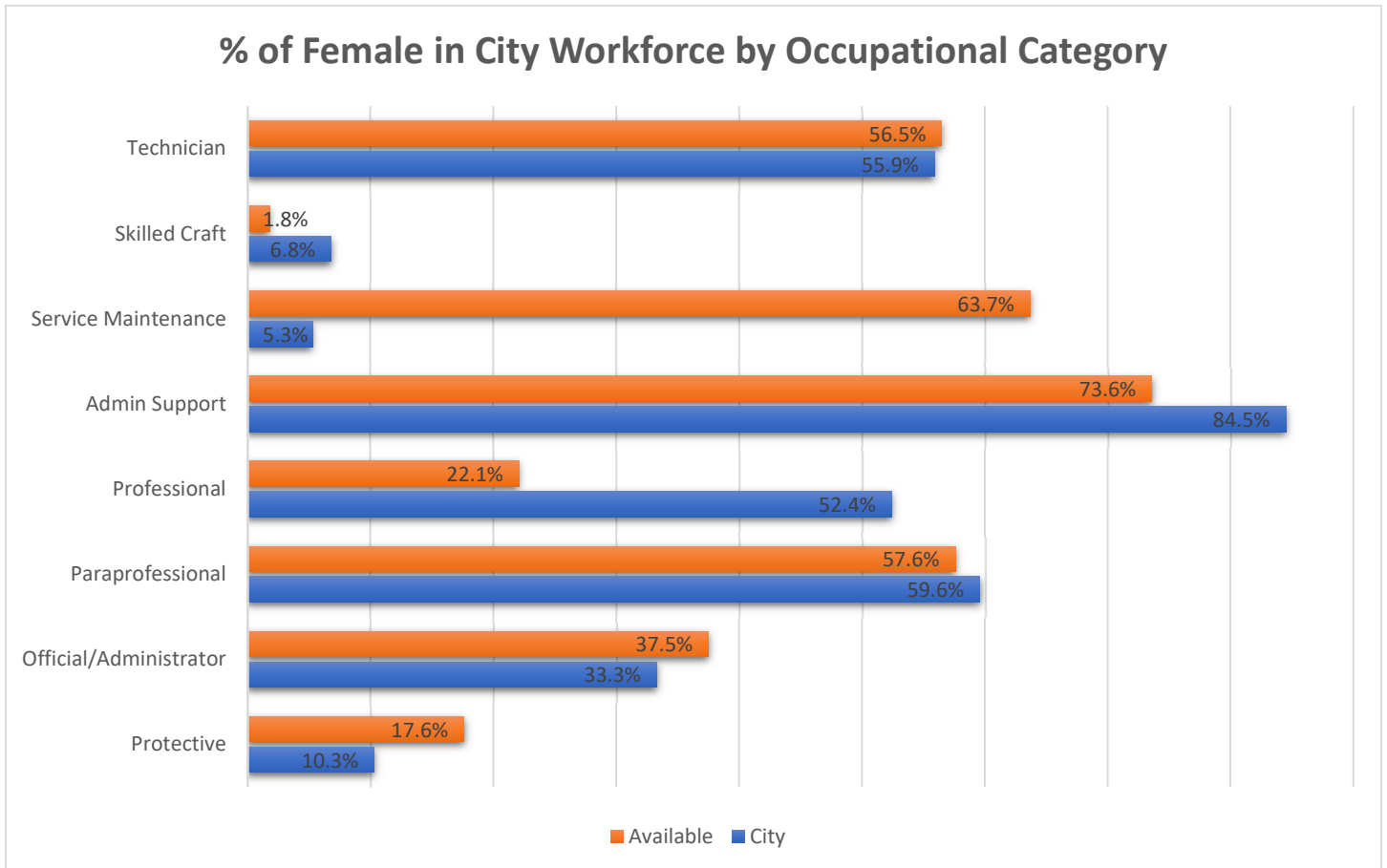
## COMPARISON OF CITY WORKFORCE TO AVAILABLE WORKFORCE BY GENDER

The City's workforce is predominantly male in addition to the available workforce being predominantly male. Males comprise 60% of the City's workforce and 56% of the available workforce. Females comprise of 40% of the City's workforce and 44% of the available workforce.



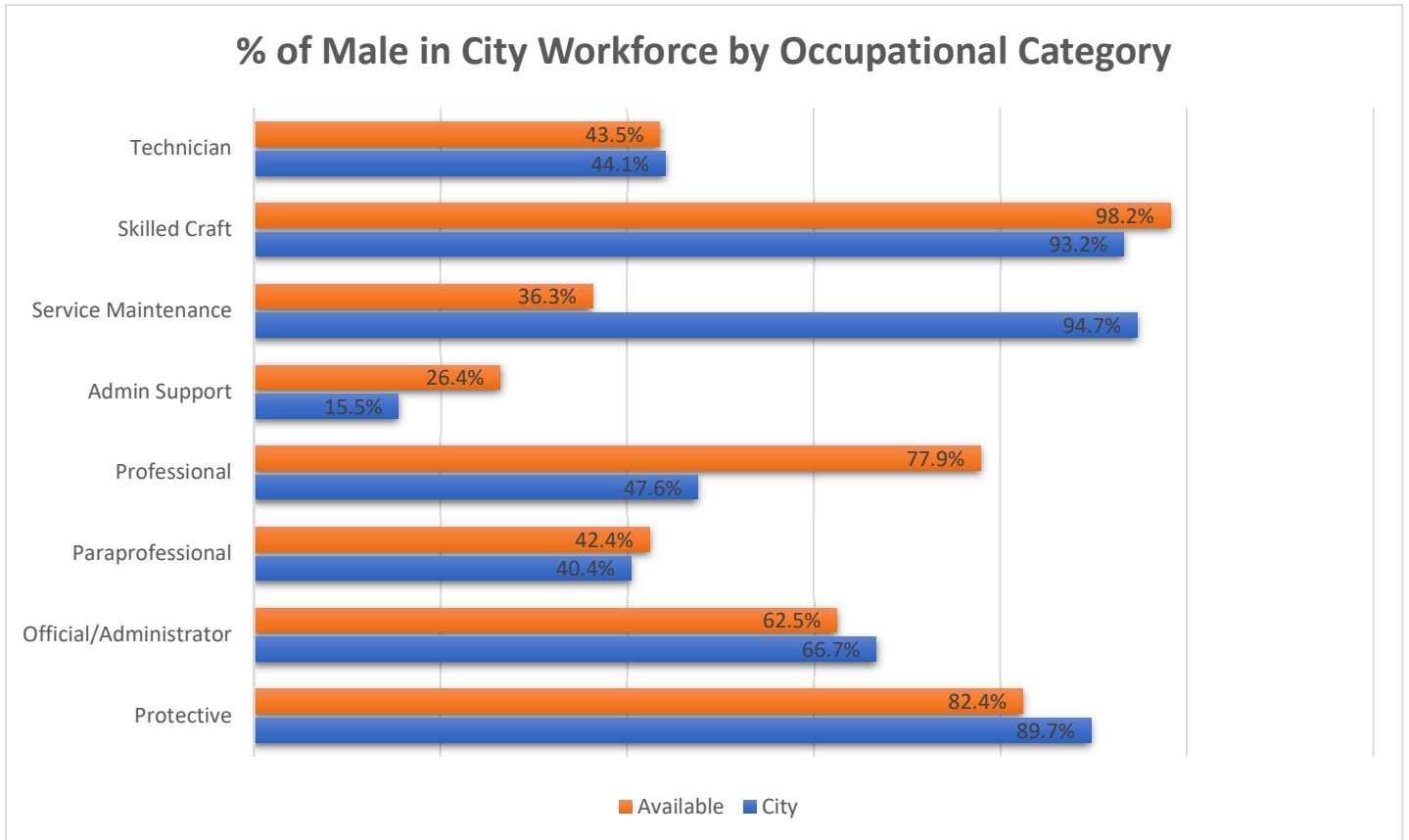


## SUMMARY OF FEMALE WORKFORCE



- Representation in the City workforce is roughly equal to (+/-2%) available workforce in the following occupational categories:
  - Paraprofessional
  - Technician
- Representation in the City workforce exceeds available workforce in the following occupational categories:
  - Skilled Craft (5%)
  - Admin Support (10.9%)
  - Professional (30.3%)
- Representation in the City workforce is *under-represented* in the following occupational categories:
  - Service Maintenance (-58.4%)
  - Protective (-7.3%)
  - Official/Administrator (-4.2%)

## SUMMARY OF MALE WORKFORCE



- Representation in the City workforce is roughly equal to (+/-2%) available workforce in the following occupational categories:
  - Technician
  - Paraprofessional
- Representation in the City workforce exceeds available workforce in the following occupational categories:
  - Service Maintenance (58.4%)
  - Protective (7.3%)
  - Official/Administrator (4.2%)
- Representation in the City workforce is *under-represented* in the following occupational categories:
  - Professional (-30.3%)
  - Admin Support (-10.9%)
  - Skilled Craft (-5%)

## PLAN OF ACTION

The City of Corona will consistently review its recruitment, hiring, and promotional policies and practices to ensure compliance with the U.S. Equal Employment Opportunity Commission. In addition, to achieve a workforce reflective of its community, the City must continue evolving outreach efforts and processes to obtain a diverse, qualified applicant pool. The following identifies the specific actions City will take to ensure equal access to employment and promotional opportunities and improve the City's position regarding underrepresented groups:

- Undertake recruitment campaigns and outreach targeting diverse candidates for employment openings with a focus on underrepresented groups to help ensure City staff demographic makeup reflects the community.
- Promote an inclusive culture in the workplace by fostering an environment of professionalism and respect for personal differences.
- Ensure recruitment selection criteria are objective, valid predictors of successful job performance and meet the employer's business needs to avoid subjective employment decisions based on personal stereotypes or hidden biases.
- Ensure that promotion criteria are made known, and that job openings are communicated to all covered individuals.
- Foster open communication and early dispute resolution.
- Ensure training for all covered individuals on Equal Employment Opportunity Laws.
- Monitor classification and compensation practices.
- Ensure that performance evaluations are based on actual job performance and that ratings are not artificially low or high.
- Provide training and mentoring that provides workers of all backgrounds the opportunity, skill, experience, and information necessary to perform well.
- Continue to develop and administer training regarding workplace discrimination, harassment, implicit bias, and inclusion to ensure equal employment opportunities.
- Conduct a comprehensive review of the City's retention efforts and programs to identify needed improvements and recommend new, inclusive, and innovative approaches to develop and retain qualified and diverse individuals.
- Continue targeted social media job postings on various platforms such as LinkedIn, Instagram, Twitter, and Facebook.
- Continue to offer Tuition Reimbursement for eligible employees to improve their job skills by providing financial assistance to complete a job-related degree or certificate successfully.

## EQUAL EMPLOYMENT OPPORTUNITY (EEO) POLICY

The City of Corona ("City") is committed to providing a professional work environment free from discrimination and harassment based on legally protected characteristics and ensuring an environment free from retaliation for participating in any protected activity covered by this policy.

The City is committed to providing equal employment opportunities to all employees and applicants for employment. Accordingly, this anti-discrimination policy is designed to encourage professional and respectful behavior and prevent discriminatory and harassing conduct in the workplace. Corrective action(s), up to and including formal discipline, in response to misconduct – including violations of the City's anti-discrimination policy will be undertaken as appropriate to meet the goals of this policy. Conduct need not violate either federal or state law to constitute a violation of these policies. A single act by any covered individual may constitute a violation of these policies and provide sufficient grounds for the City to discipline the City employee.

The City expressly prohibits any retaliation against an employee because they filed or supported a complainant or because they participated in the investigation or complaint resolution process. Individuals found to have retaliated against an employee in violation of these policies will be subject to appropriate disciplinary action, up to and including termination.

The City prohibits discrimination and harassment based on the following characteristics: race, color, caste, religion, religious creed (including religious dress and grooming practices), national origin, ancestry, citizenship, physical or mental disability<sup>2</sup> medical condition (including cancer and genetic conditions), genetic information, marital status, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity, gender expression, age (40 years and over), sexual orientation, veteran or military status, medical leave or other types of protected leave (requesting or approved for leave under the Family and Medical Leave Act or the California Family Rights Act), domestic violence victim status, political affiliation, and any other characteristic protected by state or federal antidiscrimination law covering employment. These categories are defined according to Government Code section 12920. In addition, the City prohibits retaliation against a person who engages in activities protected under this policy. Reporting, or assisting in reporting, suspected violations of this policy and cooperating in investigations or proceedings arising out of a violation of this policy are protected activities under this policy.

Any covered individual who believes they have experienced any form of employment discrimination or abusive conduct are encouraged to report the conduct immediately by using the complaint procedures provided in this plan, or by contacting the Equal Employment Opportunity Commission ("EEOC"), or the California Civil Rights Department ("CCRD").

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<sup>2</sup> The City recognizes and supports the obligation to reasonably accommodate employees with disabilities or religious beliefs or practices to allow those employees to perform the essential functions of their jobs. See the City of Corona Reasonable Accommodation Policy. If an employee believes a reasonable accommodation is needed based on disability or a religious belief or practice, the employee should discuss the matter with their supervisor or the human resources department.

## **CONDUCT PROHIBITED BY THIS POLICY/ DISCRIMINATION, HARASSMENT AND RETALIATION**

Discrimination, harassment, and retaliation of a covered individual because of the individual's actual or perceived protected classification and protected activity is prohibited.

"Covered individual" includes applicants and employees. As used in this policy, the term "employee" includes contractors and volunteers in our workplace.

"Protected Classification" includes race, color, caste, religion, religious creed (including religious dress and grooming practices), national origin, ancestry, citizenship, physical disability, mental disability, medical condition, genetic information, marital status, sex (including pregnancy, childbirth, breastfeeding, or related medical conditions), gender, gender identity, gender expression, age (40 and over), sexual orientation, or military and veteran status, protected medical leaves, domestic violence victim status, political affiliation or any other basis protected by law.

"Protected activity" includes but is not limited to making a request for an accommodation for a disability, making a request for accommodation for religious beliefs, making a complaint under this policy, opposing violations of this policy, or participating in an investigation under this policy.

### **I. Discrimination**

This policy prohibits the unequal treatment of covered individual in any aspect of employment, based solely or in part on the employee's, or applicant's, protected characteristic, including their perceived protected characteristic or association with a person who is or is perceived to be a member of a protected classification; or because the individual participates in a protected activity as defined in this policy.

Discrimination may include but is not necessarily limited to: hostile or demeaning behavior towards covered individuals because of their protected characteristic; allowing the covered individual's protected characteristic to be a factor in hiring, promotion, compensation or other employment related decisions unless otherwise permitted by applicable law, and providing unwarranted assistance or withholding work-related assistance, cooperation, and/or information to applicants or employees because of their protected characteristic.

### **II. Harassment**

Harassment includes conduct that another individual who is a member of the protected classification would find unwelcome or unwanted Harassment includes, but is not limited to, the following conduct:

(a) Derogatory, offensive, or inappropriate speech, such as epithets, slurs or stereotypical comments, or verbal propositions made based on the individual's protected classification. This includes, but is not limited to, derogatory comments, stories, and/or jokes about appearance, dress, physical features, gender identification, and race.

(b) Physical acts, such as assault, impeding or blocking movement, offensive touching, or physical interference with normal work or movement. This includes, but is not limited to, pinching,

grabbing, patting, or making explicit or implied job threats or promises in return for submission to physical acts.

(c) Visual acts, such as derogatory, offensive, or inappropriate, posters, cartoons, emails, pictures, or drawings related to a protected classification.

(d) Unwanted sexual advances, requests for sexual favors and other acts of a sexual nature, where submission is made a term or condition of employment, where submission to or rejection of the conduct is used as the basis for employment decisions, or where the conduct is intended to or does unreasonably interfere with an individual's work performance or create an intimidating, hostile, or offensive working environment.

(e) Conduct that is not intended as to harass. Conduct may violate this policy if the conduct is directed at or implicates a protected classification and the recipient finds the conduct to be offensive or inappropriate, even if its well-intentioned conduct (g., gifts, over-attention, endearing nicknames, hugs).

(f) Conduct to which the recipient appears to have consented. The City does not recognize as a defense that the recipient appeared to have consented to the conduct at issue by failing to protest about the conduct. A recipient may not protest offensive or inappropriate conduct for many legitimate reasons, including, but not limited to, the need to avoid being perceived as insubordinate or to avoid being ostracized or subjected to retaliation.

(g) Conduct about which no employees previously complained. The fact that no employee previously complained about the same or substantially similar conduct does not mean that the conduct is inoffensive or appropriate nor does that fact preclude an employee from complaining about such conduct if it is repeated.

(h) Conduct witnessed by a third party or about which a third party learns, even if they did not witness such conduct. Visual, verbal, or physical conduct between two (2) people who do not find such conduct to be offensive or inappropriate may constitute harassment of a third party witnesses such conduct or learns about the conduct later and finds the conduct to be offensive or inappropriate. Conduct can constitute harassment even if it is not explicitly or specifically directed at a particular individual.

### **III. Retaliation**

Retaliation occurs when an employer takes adverse action against a covered individual because of the individual's protected activity as defined in this policy.

Adverse action may include, but not limited to the following actions:

(a) Disciplinary actions

(b) Counseling

(c) Taking sides because an individual has reported discrimination and/or harassment

(d) Spreading rumors about a complainant or about someone who supports or assists the complainant or who participates in the investigation

- (e) Shunning or avoiding an individual who reports discrimination or harassment
- (f) Making real or implied threats of intimidation to prevent or deter an individual from reporting discrimination or harassment

Examples of retaliation under this policy include, but are not limited to, demotion; suspension; reduction in pay; denial of a merit salary increase; failure to hire or consider for hire; refusing to promote or consider for promotion because of reporting a violation of this policy; harassing another employee for filing a complaint; denying employment opportunities because of making a complaint or for cooperating in an investigation; changing someone's work assignments for identifying harassment or other forms of discrimination in the workplace; treating people differently such as denying an accommodation; or not talking to an employee when otherwise required by job duties; or excluding the employee from job-related activities because of engagement in activities protected under this policy.

## **REASONABLE ACCOMODATIONS**

The Americans with Disabilities Act ("ADA") and California's Fair Employment and Housing Act ("FEHA") prohibit employment discrimination based on a disability. It is the City's policy that no qualified applicant or employee with a disability shall be excluded from participation, be denied the benefits, or be subjected to discrimination because of their disability. The City is committed to provide a reasonable accommodation to qualified individuals with disabilities if it does not result an undue hardship on the operations of the City. The Human Resources Department can assist applicants, employees, and departments in providing accommodations.

## **COMPLAINT PROCEDURE**

All covered individuals are encouraged to attempt resolution of complaints as quickly as possible at the lowest and least formal level. Any covered individual, who believes they have been subjected to discrimination, harassment or retaliation may make a complaint, either verbally or in writing, to any supervisor, manager, their department head or to the Chief Talent Officer ("CTO") or their designee, without regard to any chain of command.

Any supervisory or management employee who receives a complaint should immediately notify the "CTO" or their designee. Upon receiving notification of a complaint regarding discrimination, harassment, or retaliation, the "CTO" or their designee will take necessary steps to investigate and eliminate any violation.

The City committed to an environment where open, honest communications are the expectation, not the exception. The City wants employees to feel comfortable approaching their supervisor or management in instances where they believe violations of policies or standards have occurred.

In situations where an employee prefers to place an anonymous report in confidence, they may submit a report through Ethics Point here: [EthicsPoint - City of Corona](#)

### **Confidentiality**

The City will make every effort to assure the confidentiality of complaints made under this policy to the greatest extent possible. However, complete confidentiality may not be possible because of the City's



need to investigate the complaint and provide the subject of the complaint their due process rights, which includes providing the subject of the investigation a copy of the complaint after the initial investigatory interview, if requested.

The City prohibits an employee who is interviewed during an investigation from attempting to influence other employees, including employees who may have witnessed the underlying conduct at issue, while the investigation is open and ongoing.

An employee may discuss their interview with a designated representative from the employee's employee association and/or the employee's legal representative. The City will not disclose a completed investigation report except as it deems necessary to support a disciplinary action, to take remedial action, to defend itself in adversarial proceedings, or to comply with the law or court order.

### **Right to File Report with an Outside Administrative Agencies**

In addition to the above, or in place of the above procedure, employees and applicants have the option of filing a complaint with either, or both, the state and federal external compliance agencies.

#### **California Civil Rights Department**

2218 Kausen Drive, Suite 100

Elk Grove, CA 95758

(800) 884-1684 (800)

(800) 700-2320 (TTY)

[www.calcivilrights.ca.gov](http://www.calcivilrights.ca.gov)

#### **United States Equal Employment Opportunity Commission**

Los Angeles District Office

255 East Temple St., 4<sup>th</sup> Floor

Los Angeles, CA 90012

(213) 785-3090

(800) 669-6820 (TTY)

[www.eeoc.gov](http://www.eeoc.gov)

Any covered individual who believes they have experienced any form of employment discrimination or abusive conduct are encouraged to report the conduct immediately by using the complaint procedures provided in this plan, or by contacting the Equal Employment Opportunity Commission ("EEOC"), or the California Civil Rights Department ("CCRD")