

**Highland Hospital
Human Resources Policy Manual**

Policy Statements

Policy #106
Reviewed: 01/26/2015

POLICY: This Policy reaffirms Highland Hospital's commitment to nondiscrimination, equal opportunity, and affirmative action in employment and equal access to and treatment in Hospital programs and activities in accordance with federal, state, and local laws and regulations.

I. GUIDELINES

A. Equal Employment Opportunity and Nondiscrimination:

Highland Hospital, as a health care institution and as an employer, values diversity and is committed to equal opportunity for persons regardless of age, color, disability, ethnicity, gender identity or expression, genetic information, marital status, military/veteran status, national origin, race, religion/creed, sex, sexual orientation or any other status protected by law. Highland Hospital will not engage in discrimination or harassment and is committed to equal opportunity for all persons.

Highland complies with all applicable non-discrimination laws in the administration of its policies, employment, and access to and treatment in programs and activities. The Hospital will take affirmative steps to support and advance these values.

1. Decisions in recruitment, hiring, promotions, transfers, and opportunities for training are made without regard to the above, except where there is a verifiable occupational requirement. Such decisions will be based upon the individual's qualifications for the position, so as to further the principles of affirmative action and equal employment opportunity.
 - a. Efforts to solicit the candidacy of minority group members, women, and disabled persons are a standard recruitment practice.
 - b. Recruitment and personnel actions are monitored to ensure consistent application of this policy.
 - c. Position notices and advertising for positions will include a notation which conveys that "Highland Hospital is an Equal Opportunity Employer M/F/Disability/Protected Vet".
2. Compensation and benefits policies are established and administered without regard to the above, except where it is a verifiable occupational requirement.
3. All personnel decisions and actions are based upon individual qualifications for the work, and most particularly, the individual's job performance.

Questions on compliance should be directed Chief Human Resources Officer Kathleen M. Gallucci, Highland Hospital, 1000 South Avenue, Box 44, Rochester NY 14620.

B. Affirmative Action:

Responsibility for the implementation and monitoring of this Policy and equal employment opportunity and affirmative action programs is delegated by The Chief Operating Officer to the Chief Human Resources Officer. The Chief Human Resources Officer is responsible for ensuring compliance with Affirmative Action requirements and for ensuring that Highland Hospital's policies conform with applicable laws concerning nondiscrimination, equal opportunity, and affirmative action, for facilitating the collection, maintenance, and analysis of all statistical data for required governmental reports, reviewing personnel decisions to ensure conformance with this policy, and implementing other measures, as needed, to ensure compliance with the commitments of the institution pursuant to this Policy. Questions regarding the affirmative action program should be directed to Chief Human Resources Officer, Kathleen M. Gallucci, Highland Hospital, 1000 South Avenue, Box 44, Rochester NY 14620 or via phone to (585) 341-0515. Copies of the affirmative action plan are available for review between the hours of 9:00AM and 4:00PM by contacting the number above or visiting the above address.

1. Recruitment:

- a. Highland engages in the active recruitment of minorities, females, qualified disabled persons, and protected veterans by ensuring that jobs are posted with employment service delivery systems and local and national organizations with connections to qualified applicants from protected groups.
- b. Highland annually reviews the effectiveness of its efforts to recruit qualified applicants from protected groups and adjusts its recruitment and outreach strategies by identifying and implementing alternative recruitment efforts as needed.
- c. Job descriptions periodically are reviewed and revised to ensure that duties are accurately described, that the experience and education requirements are strictly job-related. Job titles have and will continue to be written without regard to protected status (i.e., sex, race, color, national origin, religion, age, veteran, disabled or other protected status).
- d. Application forms are reviewed to ensure that all requested information is job-related and that the forms comply with all applicable laws and are in an accessible form. In addition, all recruitment postings or advertisements state that that "Highland Hospital is an Equal Opportunity Employer M/F/Disability/Protected Vet".
- e. Applications for open positions are electronic and mechanisms are in place to ensure that individuals with disabilities who are unable to utilize the electronic application system have the opportunity to apply for position via alternative mechanisms.

2. Hiring:

- a. Highland Hospital hires for all positions without regard to age, color, disability, domestic violence status, ethnicity, gender identity or expression, genetic information, marital status, military/veteran status, national origin, race, religion/creed, sex, sexual orientation or any other status protected by law.
- b. Interviews are conducted by Hospital representatives who have received training with regard to equal opportunity and affirmative

action obligations and/or non-discrimination and anti-harassment laws.

- c. Placing an applicant in a specific job in a department is the responsibility of management. All employment decisions are based solely upon the individual's qualifications for, and ability to perform the essential functions of the position being filled, with or without reasonable accommodation.
3. Advancement in Employment:
 - a. Highland provides every reasonable opportunity for employees to advance. In this regard, training and other developmental opportunities are available to help employees develop skills that will lead to advancement.
 - i. Career development enables all employees to identify and designate career paths and positions for which they wish to be considered. Employees are encouraged to contact their supervisor and/or Human Resources should they desire information relative to another Highland Hospital position.
 4. Terminations:
 - a. Terminations and/or reductions in the workforce are made without regard to protected status.
 5. Compensation:
 - a. Compensation is reviewed, at a minimum, on an annual basis to ensure equitable pay practices. If it is noted that an inequity exists between men and women or non-minorities and minorities are discovered, this will be reviewed to determine whether such differences are the result of legitimate, nondiscriminatory factors (e.g., tenure, time in job, performance, education, prior experience, specialty, etc.). Where appropriate, and where review supports an adjustment, necessary salary adjustments are undertaken.
 6. Provision of Reasonable Accommodations for disabled persons:
 - a. Highland Hospital is committed to providing reasonable accommodations to disabled persons to ensure equal access to employment and to all benefits associated with employment, at no cost to the employee.
 - b. Highland encourages disabled persons who require a disability-related work accommodation to request an accommodation by speaking with a supervisor, The Leave Administration Coordinator or an Human Resources Manager.
 7. Contractors and Unions:
 - a. Contractors, subcontractor and unions are advised of Highland's equal opportunity, affirmative action, and anti-discrimination policies and applicable contracts will include required equal opportunity and affirmative action language.
 8. Recordkeeping:
 - a. Highland Hospital retains records for all job applicants who have expressed interest in a particular position, possess the basic qualifications for the position, and were considered for the position, for a minimum of three (3) years. Applicant records retained include; job descriptions, job postings and advertisements, resumes/curriculum vitae, all correspondence and interview notes, emails pertaining to applicants, ranking sheets, etc.

- b. As required by law at various points in the hiring and employment process, Highland Hospital attempts to collect and will maintain, once collected, records containing demographic information (race, ethnicity, gender, disability and veteran status).
9. Audit and complaints:
- a. At least annually, and as needed, a workplace analysis by job group of hiring, promotion and termination decisions and a utilization analysis to identify potential disparities in recruitment and employment based on race, gender, or disability is conducted. Highland also establishes where appropriate, specific goals designed to overcome underutilization and takes other actions to address any potential concerns evidenced by statistical disparities.

References:

HR Policy 100 –Employment
HR Policy 104 – Transfer Promotion Demotion
HR Policy 106 – Policy Statements
HR Policy 124 - Termination of Employment
HR Policy 130 - Non-Discrimination and Non-Harassment

Created: September 2008

Revised: 01/26/15

Reviewed: 11/04/08
04/26/12