

TOWN OF ENFIELD

CONNECTICUT

AFFIRMATIVE ACTION PLAN

REVISED AND UPDATED
NOVEMBER 2009



TOWN OF ENFIELD

AFFIRMATIVE ACTION POLICY STATEMENT

As Town Manager of the Town of Enfield I recognize the need for Affirmative Action and I pledge my commitment to undertake positive actions to overcome the present effects of past practices or barriers to equal employment opportunity and to achieve the full and fair participation of minorities, women, people with disabilities, older persons, and all other protected groups found to be underutilized in the Enfield's work force or affected by policies having an adverse impact. In the spirit of Executive Order 11, signed by Governor Ella Grasso November 21, 1975, and Executive Order 9, signed by Governor William A. O'Neill on January 3, 1984, I further state that this Town will comply with the anti-discrimination provisions of the state and federal laws and regulations listed at the end of this section.

I recognize the hiring difficulties experienced by minorities, people with disabilities and by many older persons and, where appropriate, I have set goals to overcome the present effects of past discrimination, if any, to achieve the full and fair utilization of such persons in the work force. I further pledge that the Town of Enfield will affirmatively provide services and programs in a fair and impartial manner.

Where adverse impact is identified, the Town will: (1) review its personnel policies and procedures to ensure that barriers, which unnecessarily exclude protected classes and practices, which have an illegal discriminatory impact, are identified and eliminated; (2) explore alternative approaches to employ minorities and members of protected classes; (3) administer all terms, conditions, privileges and benefits of the employment process in an equitable manner; and (4) establish procedures for the extra effort that may be necessary to ensure that the recruitment and hiring of protected group members reflect their availability in the job market.

It is the policy of the Town of Enfield to provide equal employment opportunities without consideration of race, color, religion, age, sex, marital status, national origin, genetic information, past/present history of mental disability, ancestry, mental retardation, learning or physical disabilities including but, not limited to blindness, sexual orientation, political belief or criminal record, unless the provisions of Section 46a-60(b), 46a-80(b) and 46a-81(b) of the Connecticut General Statutes are controlling or there is a bonafide occupational qualification excluding persons in one of the above protected groups. This policy applies to all aspects of the employer/employee relationship including, but not limited to, recruitment, hiring, referrals, classifying, advertising, training, upgrading, promotion, benefits, compensation, discipline, layoff and terminations.

The Town of Enfield will implement, monitor and enforce this Affirmative Action Policy Statement in conjunction with the applicable federal and state laws, regulations and executive orders listed below: 13th, 14th and 15th Amendments of the United States Constitution, Civil Rights Act of 1866, 1870, 1871, 1964, 1965 and 1991 Equal Pay Act of 1963, Title VI and VII of the 1964 United States Civil Rights Act, presidential Executive Orders 11246, amended by 11375, (Nondiscrimination under federal contracts), the Age Discrimination in Employment Act, Article 1 Section 1 and 20 of the Connecticut Constitution, Governor Grasso's Executive Order Number 11, Governor O'Neill Executive Order Number 9, the Connecticut Fair Employment Practices Law (46a-63-64), Discrimination against Criminal Offenders (46a-80). Connecticut General Statutes, Connecticut Code of Fair Accommodations Law (46-63-64), definition of Blind (46a-51 (1), definition of Physically Disabled (46a-51 (15), definition of Mentally Retarded (46a-51 (13), cooperation with the Commission of Human Rights AND Opportunities (46a-77), Sexual Harassment (46-60-(a) Connecticut Credit Discrimination Law (360436 through 439), Title I of the State and the Local Fiscal Assistance Act of 1972 and An Act Concerning Discrimination on the Basis of Sexual Orientation (PA #91-58) and the Americans with Disabilities Act of 1992.

This policy statement will be given annually to all Town employees and will also be posted throughout the Town Offices. I also expect each supplier, union, consultant and other entity (s) with which we do business to comply with all applicable State and Federal Equal Opportunity laws and regulations. The Town will not knowingly do business with any entity debarred from participation in any federal or state program or found to be in violation of any state or federal anti-discrimination law.

I have assigned the responsibility to achieve the successful implementation of our goals and objectives to the Human Resources Director located in Town Hall (phone-860-253-6346)

October 27, 2009
Date


Matthew Coppler, Town Manager

THIS STATEMENT IS AVAILABLE IN LARGE PRINT OR ON AUDIO TAPE FROM THE ADA-504 COORDINATOR BY CALLING THE HUMAN RESOURCES DIRECTOR

INTRODUCTION:

The Town of Enfield wishes to reaffirm its pledge of Affirmative Action and Equal Employment Opportunity for all at this time

The Town of Enfield being fully committed to Equal Employment Opportunity and, noting the underutilization of female and minority group members in its workforces, the Town of Enfield will apply Affirmative Action principles to all phases of its employment practices. The Town of Enfield believes a diversified workforce will promote understanding among persons to meet our citizen's needs.

It has been and will continue to be the policy of the Town of Enfield to provide equal employment opportunities for all persons regardless of race, color, creed, sex age, sexual preference, marital status, national origin, maternity status, physical or mental disability (present or past history thereof) or any other non-merit factor. The Town of Enfield considers applicants for employment and promotional candidates on the basis of qualifications to meet the essential functions of the position without regard to any of the aforementioned factors. Equal employment opportunity requires procedures, steps and actions designed to ensure and provide equal job opportunities achieved by utilizing practices designed to eliminate any discriminatory practices, particularly to ensure full utilization of women and minority applicants and employees. All town resources should be used in an effort to attain the stated objectives of equal employment opportunity through policies of non-discrimination.

OVERALL STATEMENT:

It has always been the policy and will continue to be the strong commitment of the Town of Enfield, Connecticut and all contractors and subcontractors who do business with this municipality to provide equal opportunities in employment to all qualified persons solely on the basis of job-related skills, ability and merit. The Town of Enfield will continue to take Affirmative Action to ensure that applicants are employed and that employees are treated during employment without regard to their race, color, creed, sex age, sexual preference, marital status, national origin, maternity status, physical or mental disability (present or past history thereof) or any other non-merit factor. Such action includes, but is not limited to, employment, upgrading, demotion or transfer; recruitment or recruitment advertising; layoff or termination; rates of pay or other forms of compensation and selection for training including apprenticeship. The Town of Enfield, its contractors and subcontractors will continue to make good faith efforts to comply with all Federal and State laws and policies which speak to equal employment opportunity.

The Town of Enfield fully supports the goal of remedying the detrimental effects of discrimination through affirmative action programs. The Town recognizes that the under representation of women and minorities can result from unintentional discrimination, and that equal employment opportunity laws improve public service by encouraging a broader range of individuals to contribute their unique talents and abilities. The Town of Enfield acknowledges that the effective application of this policy requires positive steps be taken; and it has and therefore will continue to undertake a program of affirmative action and make known its commitment in this regard.

The Town of Enfield recognizes it's legal and moral obligations to promote the national policy of eliminating discrimination in employment practices by following current and any future, federal and state statutes, executive orders, guidelines and regulations pertaining to the Equal Employment Opportunity Law as stated above in the Affirmative Action Policy Statement

EQUAL EMPLOYMENT OPPORTUNITY POLICY STATEMENT:

The Town of Enfield shall maintain a strong commitment to provide equal opportunities in employment to all qualified personnel solely on the basis of merit or job-related skills and ability. These efforts will be consistent with the laws and principles of the United States and the State of Connecticut. The Town of Enfield shall adhere to the principles of equal opportunity to ensure that all applicants for employment are treated without regard to their race, color, creed, sex age, sexual preference, marital status, national origin, maternity status, physical or mental disability (present or past history thereof) or any other non-merit factor. This principle applies to employment considerations, promotions, demotions, transfers, recruitment, layoffs, terminations, rates of pay, and selection for training. The Town of Enfield, its contractors and subcontractors, shall continue to make efforts to comply with all federal and state laws and policies that address equal opportunity.

IMPLEMENTATION PLAN – RESPONSIBILITY:

The Town Manager and Human Resources Director will be responsible for developing policy statements, affirmative action programs, and internal and external communications. This responsibility includes regular review of procedures to determine effectiveness, need for remedial action to meet goals that have been set. Technical aspects of compliance, such as the keeping of reports, may be delegated, but the final responsibility and authority for all aspects of Enfield's Affirmative Action Program remains with the Town Manager. The implementation plan shall include:

1. Writing, amending and updating the Affirmative Action Plan bi-annually with the review and approval of the Town Manager.
2. Establishing policies and guidelines to facilitate the implementation of equal opportunity employment through recruitment and personnel procedures and purchasing procedures;
3. Communicating such policies and guidelines to Department Heads and employees. Post the equal opportunity policy statement and notice of the Affirmative Action Plan in the Town Clerk's office, on municipal employee information bulletin boards, and with each collective bargaining unit. Copies will be made available to prospective job applicants upon request;
4. Monitoring and evaluating the program to make relevant revisions to problem areas through the analysis of applicant pools with the use of EEO Questionnaire; (See Attached - Equal Opportunity Questionnaire)
5. Review practices with respect to recruiting, hiring, transfer, promotion, training, development, compensation, benefits, lay-off, collective bargaining negotiations and termination procedures with the intent of eliminating discriminatory practices;
6. Preparing and submitting all appropriate federal and state government forms such as the EEO-4
7. The Town Annual Report will contain the general policy statement on equal employment opportunity and it will be incorporated in prospective job applications.
8. Providing a forum to raise questions relative to equal employment opportunity policies.

The Human Resources Director will hear formal complaints of discrimination and render decisions in accordance of procedures outlined in this policy.

RECRUITMENT AND PERSONNEL GUIDELINES FOR EEO:

1. Review of Job Descriptions: The Town shall regularly review job descriptions and minimum requirements are job-related. The intent is to eliminate any discriminatory effects implicit in the present position descriptions. It is the policy of the Town of Enfield to seek and to employ only fully qualified persons to fill vacancies in all positions.
2. Recruitment: The Town shall continue to stimulate interest among targeted groups based on workforce analysis for employment with the Town of Enfield
 - Community agencies and colleges, which serve minority and women populations, will be notified of the Town's Affirmative Action Plan and equal employment policies and of job opportunities as they become available. The decision of which agencies to be notified will depend upon the type of position available. A continuing analysis of the effectiveness of advertising campaigns shall be conducted, dropping non-productive sources and continuing a search for more responsible sources.
 - Job application procedures will be kept as simple as possible so as not to deter any potential applicants. Accommodations or other assistance will be provided to applicants as needed in accordance with the Affirmative Action Plan and ADA.
 - All advertisements will be sent to the State Job Centers/Employment Offices
 - Word of mouth referrals from minority and female employees will be encouraged
 - Encourage the use of tuition-reimbursement programs and training programs to improve promotional opportunities
 - All applicants for employment shall be requested to complete an Equal Opportunity questionnaire for statistical purposes only in order for the Town To collect data to evaluate the number of female and minority applicants seeking available employment with the Town.
3. Testing: The Town shall review testing procedures for new applicants and promotions to insure they are appropriate and related to the essential duties of the position.
4. Compensation and Benefits: The Town will insure all employees receive the same employee benefits without discrimination based upon race, color, creed, sex age, sexual preference, marital status, national origin, maternity status, physical or mental disability (present or past history thereof) or any other non-merit factor. The Town will review compensation levels to insure they equal market salaries and salaries are based on position value and not subject to discrimination based upon race, color, creed, sex age, sexual preference, marital status, national origin, maternity status, physical or mental disability (present or past history thereof) or any other non-merit factor
5. Training: The Town shall develop training programs, as feasible, to enhance opportunities for promotion of women and minorities within the town employment such as interview skills, supervision skills, etc. The Town will also provide training, as required or needed, about Equal Employment Opportunity, preventing discrimination, sexual or other harassment prevention, etc. The Town shall provide training to supervisors, and employees when possible, about the Affirmative Action Plan and Sexual Harassment Prevention Policy and ADA Policy
6. Exit interviews may be conducted of employees to inquire if they experienced or witnessed any discriminatory practices while employed by the Town of Enfield.

PURCHASING POLICIES AND GUIDELINES FOR EEO:

To promote Equal Employment Opportunities the Town will require all vendors doing business with the Town to support and promote Equal Employment Opportunities by signing the appropriate documents as listed below. Bid Documents will have the following language to promote Equal Employment Opportunities:

Legal Advertisement Language:

Equal Opportunity Employer, minority/women owned businesses are encouraged to submit a bid.

Bid Boiler Plate Language:

FAIR EMPLOYMENT PRACTICES

The Bidder agrees not to discriminate against any employee or applicant for employment in the performance of this bid's work with respect to hire, tenure, terms, conditions, or privileges of employment due to race, sex, age, religion, national origin, or other condition prescribed by State or Federal law.

POLICY DISSEMINATION:

Critical to guaranteeing attainment of equal employment opportunity goals is the awareness and understanding of the Affirmative Action Plan by all applicants and employees. To this end, the Town of Enfield has implemented the following procedures:

A. Internal

1. Department Heads, Human Resources Director and the Town Manager shall review drafts, revisions and updates of the Affirmative Action Plan for their input and support.
2. Revisions and updates of the Affirmative Action Plan shall be approved by the Town Council to ensure full support of the Town toward equal employment opportunity.
3. The Affirmative Action Plan shall be available to all employees and shall be given to all new employees, which includes a Policy on Harassment in the Workplace. And ADA Policy
4. The Town's Affirmative Action Plan shall be posted on the Town Bulletin Boards.

B. External

1. All bid specification sent to potential vendors shall contain the language indicated in the Purchasing Policies and Guidelines for EEO listed in this document.
2. All advertisement for recruitment of Town employees shall state that the Town of Enfield is an "Affirmative Action-Equal Employment Opportunity Employer (AA/EEO)
3. The Town's Affirmative Action Plan shall be available to all applicants.
4. Community agencies, which serve minority and women populations, shall be notified of Town of Enfield job opportunities to encourage all applicants to apply, especially minorities and women.

UTILIZATION ANALYSIS AND GOALS:

The purpose of a utilization analysis is to identify where and to what extent the protected groups may be under-utilized or concentrated within the employment structure, in order to rationally

develop affirmative action goals. These documents are always changing depending upon vacancies, promotions, recruitments, etc. Therefore, the utilization analysis (EEO-4 form) is attached along with analysis of recruitment data from the past year. These reports allow the Town of Enfield to set goals for the next years based on the analysis of these reports compared to the census data for Town and Region. The 2009-2010 goals for the Town of Enfield are to:

- More Minorities in all job categories
- More women in Officials, Technicians, Skilled/Craft Workers and Police/Service job categories

Measures to be taken to meet the Town Goals:

- We will monitor our applications for information about how candidates learned about our positions so we can reach as many diverse candidates as possible
- The HRIS system will keep records about Hires, Promotions, Transfers and terminations to allow us to analyze our methodology and improve our efforts
- All jobs will be posted with the Department of Labor and will be advertised in appropriate professional locations as needed and in the Minority News.
- The Town has a tuition reimbursement program which will help employees with gaining the training and education for opportunities for promotions or transfers. Employees will also be afforded the opportunity for in-house training to prepare for promotions or transfers.
- Manager and Supervisors will be given training on affirmative action goals and equal opportunity procedures so when they participate in the recruiting process they understand that the town does not discriminate
- To provide a diverse applicant pool the Town will focus on recruitment in the City of Hartford, CT and Springfield, MA. However the availability of adequate transportation from these locations has deterred more minorities and females to apply for Town Positions. This may improve with the new Transportation Center that is proposed for the Town of Enfield
- We will monitor our employment polices to make sure that our polices do not discriminate
- The Human Resource Department will be available to all person who wish to learn more about job opportunities for the Town of Enfield and will make every effort to assist them in the employment process

GRIEVANCE PROCEDURE:

Any employee or applicant who feels he or she is being discriminated against because of race, color, creed, sex age, sexual preference, marital status, national origin, maternity status, physical or mental disability (present or past history thereof) or any other non-merit factor in any personnel action including but not limited to classification, compensation, training or employment, may initiate an affirmative action complaint. The individual may bring the complaint to the attention of the Human Resources Director -860-253-6346 for resolution.

If the complaint cannot be resolved at this point, the employee may contact the state agency charged with enforcing anti-discrimination laws, the Commission on Human Rights and Opportunities (CHRO), and the Federal agency, the Equal Employment Opportunity Commission (EEOC).

See attached EEO Form.

**CONNECTICUT COMMISSION ON HUMAN RIGHTS AND OPPORTUNITIES
WORKFORCE ANALYSIS**

Contractor Name: Town of Enfield
 Address: 820 Enfield Street
Enfield, C.T. 06082

Total number of CT employees:
 Full-time 315 Part time 404
 Obtained from employment records

Complete the following Analysis for employees of Connecticut work sites who are:

JOB CATEGORIES	OVERALL TOTALS (SUM OF ALL COLS. MALE & FEMALE)	WHITE (NOT OF HISPANIC ORIGIN)		BLACK (NOT OF HISPANIC ORIGIN)		HISPANIC		ASIAN OR PACIFIC ISLANDER		AMERICAN INDIAN OR ALASKAN NATIVE		PEOPLE WITH DISABILITIES	
		MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE	MALE	FEMALE
OFFICIALS & MANAGERS	29	17	9			1		1		1			
PROFESSIONALS	56	25	30				1						
TECHNICIANS	38	23	15										
PARAPROFESSIONAL	110	30	77	1	1	1							1
SALES WORKER	-												
OFFICE & CLERICAL	94	16	74		1		3						
CRAFT WORKERS (Skilled)	47	42				2				1			
OPERATIVES (Semi-skilled)	-												
LABORERS (unskilled)	322	140	153	19	4	3	4		1				
SERVICE WORKERS	83	71	7	2		2	1						
TOTALS ABOVE	779	364	365	22	6	9	9	1	1	2			
TOTALS ONE YEAR AGO	778	364	353	21	13	12	9	2	1	3			1

FORMAL, ON - THE JOB TRAINEES (Enter figures for the same categories as are shown above).

Apprentices													
Trainees													

EMPLOYMENT FIGURES WERE OBTAINED FROM VISUAL CHECK: _____ EMPLOYMENT RECORDS: _____ OTHER: _____

1. Have you successfully implemented an Affirmative Action Plan? Yes: Date of implementation 2000
 Not Applicable: _____ Explain: _____

(a) Please submit a summary of your Affirmative Action Plan.

2. Have you successfully developed an apprenticeship program complying with Sec. 46a-68-17 of the Connecticut Department of Labor Regulations, inclusive? Yes: _____ No: _____ Not Applicable: Explanation: Municipal government

3. According to EEO-1 data, is the composition of your workforce at or near parity when compared with the race and gender composition of the workforce in the relevant labor market area? Yes: No: _____ Explanation: _____

4. If you plan to subcontract, will you set aside a portion of the contract for legitimate minority business enterprises?

Yes: _____ No: _____ Explanation: no municipal government

Pamela Frank
 Contractor's Authorized Signature
Interim HR Director

9/29/09
 Date