

However, differences in capabilities may not be assumed to exist as a function of sex, nor may any employment decisions be made on the basis of sex.

- Disparities by sex in salaries for identical job listings are noted and justifications are presented where they exist. In cases where no justification exists, the provisions for equal pay for the same work without regard to sex will be implemented. Audit and review of salaries is required. The Director of Affirmative Action and Compliance must discuss this review and audit with management personnel in order to formulate and implement methods for correcting deficiencies.
- The qualifications for placement in all job classifications are the same for both males and females. Affirmative action will be taken to correct any clustering of males due to stereotyped job placement in some job categories.
- The Director of Affirmative Action and Compliance is directed to maintain contact with agencies responsible for enforcing Equal Employment Opportunity/Affirmative Action Regulations and the Equal Pay Act. Before making decisions relative to overlapping and potentially conflicting administration, the director of Affirmative Action and Compliance may consult with the administrator of the appropriate agencies.
- Procedures are outlined and responsibility is assigned for developing affirmative action programs to recruit females as well as minorities into positions not typically held by them. Various action programs aimed at recruiting women (and minorities) not currently in the workforce and at eliminating the effects of stereotyped concepts of job placement are addressed throughout this report.

## **Sexual Harassment**

Sexual harassment, like harassment on the basis of color, race, religion, or national origin, has long been recognized by the Equal Employment Opportunity Commission as a violation of Section 703 of Title VII of the Civil Rights Act of 1964, as amended.

Federal interpretation of sexual harassment states that such “unwelcome behavior may be either physical or verbal in nature.” The three guidelines for determining whether an action constitutes unlawful behavior are:

- When submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment, i.e. quid pro quo harassment;
- When submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual, quid pro quo harassment;
- When such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile, or offensive working environment, commonly known as “hostile working environment.”