



**CHICAGO PARK DISTRICT**

# Equal Employment Opportunity Policy

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# I. Statement of Purpose & Overview

The Chicago Park District (“Park District”) is an equal opportunity employer and is committed to providing equal opportunity in its recruitment, hiring, promotions, and other employment actions. The Park District prohibits discriminatory employment actions based on actual or perceived race, color, national origin, ancestry, sex, sexual orientation, gender identity, religion, age, marital status, military status, disability, or any other category protected by state or federal law or local ordinance.

The Office of Prevention and Accountability (“OPA”) is tasked with the implementing and enforcing the Park District’s Equal Employment Opportunity Policy (“Policy”). Any violation of this Policy or any concerns regarding the implementation of this Policy should be reported to OPA. Retaliation against any person who makes a report concerning potential violations of this Policy, or assists OPA in enforcing this Policy, is forbidden pursuant to the terms of this and other Park District policies.

All employees are expected to comply with this Policy, and department heads and supervisors are expected to cooperate fully in meeting the Park District’s equal employment goals.

## II. Prohibited Conduct

- A. Discrimination.** The Park District prohibits employment decisions and practices based on an individual’s race, color, national origin, ancestry, sex, sexual orientation, gender identity, religion, age, marital status, military status, disability, or any other category protected by state or federal law or local ordinance.
- B. Harassment.** The Park District prohibits sexual harassment and harassment based on race, color, national origin, ancestry, sex, sexual orientation, gender identity, religion, age, marital status, military status, disability, or any other category protected by state or federal law or local ordinance.

Harassment includes any unwelcomed conduct that is based on race, color, national origin, ancestry, sex, sexual orientation, gender identity, religion, age, marital status, military status, disability, or any other category protected by state or federal law, or local ordinance. Additional forms of harassment may include, but are not limited to, the use of vulgar language, abusive acts or language, hostility, physical aggression, intimidation, or unequal treatment. *See also*, Chicago Park District Sexual Harassment Prevention Policy, Section D, Conduct Prohibited.

- C. Retaliation.** This Policy prohibits retaliation against any employee who: (1) makes a good faith complaint or report of discrimination, harassment, or any conduct prohibited by this Policy; (2) opposes discriminatory practices within the workplace; and/or (3) cooperates

with or assists the District in resolving or investigating a complaint of discrimination, harassment, or any conduct.

### III. Applicability

This Policy is applicable to current and former employees of the Park District and applicants for Park District employment. Nothing in this Policy is intended to nor shall be construed to create a private right of action against the Park District or any of its employees. Furthermore, no part of this Policy shall be construed to create contractual or other rights or expectations. Furthermore, nothing herein is intended to affect the right of any person to make a charge of discrimination at the Chicago Commission on Human Relations or to any state or federal agency with jurisdiction over such claims, raise a grievance under a collective bargaining agreement, or consult a private attorney.

### IV. Responsibilities of Regional Managers & Department Heads

Each department head must take necessary steps to implement this Policy within their department.

### V. Responsibilities of Supervisors

**Reporting Potential Violations.** Any supervisor who becomes aware of conduct that may be considered discriminatory, harassing, or retaliatory as stated in this Policy must report such conduct to OPA. A supervisor who is aware of, or reasonably should be aware of discriminatory, harassing, or retaliatory conduct—whether or not a complaint has been made by an employee—must report it to OPA as soon as possible, but no later than five (5) business days after being made aware. Failure to timely report may result in discipline, up to and including termination.

### VI. Reporting Prohibited Conduct

Any employee or applicant for employment who believes that they have been discriminated against, or harassed on the basis of race, color, national origin, ancestry, sex, sexual orientation, gender identity, religion, age, marital status, military status, disability, or any other category protected by state or federal law, or local ordinance, or who claims to have suffered retaliation as described in Section II of this Policy, should submit a complaint to OPA.<sup>1</sup>

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<sup>1</sup> In cases of allegations of sexual harassment, please follow the procedures set out in the Chicago Park District's Sexual Harassment Prevention Policy.

- A. Employees should bring their complaints as soon as possible to help ensure an effective investigation. This allows for preservation of relevant information to ascertain the best remedial measures. Filing a complaint with OPA does not bar the right of a person to file a similar charge with the Chicago Commission on Human Relations or any local, state, or federal agency with the authority to hear matters of discrimination.

## VII. Investigation of Complaints

- A. **Initiating the Investigation.** OPA shall, in collaboration with other Park District departments as appropriate, conduct thorough, fair, impartial, and independent investigations regarding any alleged violation of this Policy.
- B. **Duty to Cooperate.** All employees shall cooperate in the course of an investigation under this Policy. Failure to cooperate may subject an employee to discipline. Any employee who knowingly makes a false discrimination, harassment, or retaliation accusation or knowingly provides false information in the course of an investigation may be subject to discipline, up to and including termination. A complaint made in good faith will not be considered a false accusation, even if it is found to be unsubstantiated
- C. **Investigation Reports.** At the conclusion of the investigation, OPA shall prepare a written report of its findings and any recommendations, which shall be submitted to the General Superintendent and Chief Executive Officer. The report shall not mention the name of any informant, complainant, witness, or person investigated, except as necessary to communicate and/or recommended penalties for violations or unless otherwise authorized by the General Superintendent and Chief Executive Officer.
- D. **Notification of Parties.** OPA shall provide written notification to the complaining party and the accused party, informing them of the outcome of the investigation.
- E. **Departmental/Human Resources/General Counsel/Superintendent Response.** If a report issued by OPA recommends an action, the responsible party will be given a reasonable time frame to respond. The response shall be in writing and shall indicate the actions taken, including whether the recommendation in the report was followed, whether an alternative action was taken, or whether no action was taken.
- F. **Confidentiality.** All complaints and investigations will be confidential to the extent possible and allowed by law. To aid in preserving confidentiality, the distribution of the investigative report and investigation file may be limited.

## VIII. Complaints Against District Vendors

Where there are allegations of inappropriate conduct by individuals employed by Park District vendors, partners or contractors, complaints should be submitted to OPA. The Park District's authority over non-Park District employees may be limited.

## IX. Withdrawing Complaints

A complaint under this Policy may be withdrawn at any time by the person who filed the complaint. Withdrawal of a complaint must be made or confirmed in writing.

Before making a decision to end an investigation, OPA shall determine whether corrective action is needed to address inappropriate conduct. In some instances, OPA will find it appropriate to end the investigation when the complaint is withdrawn. In other instances, OPA may determine that it needs to continue the investigation or recommend action to remedy inappropriate behavior.

## X. Penalties

Employees found to be in violation of this Policy will be subject to discipline, up to and including termination.

## XI. Contacting the Office of Prevention & Accountability

The Office of Prevention and Accountability may be contacted at:

**Confidential Hotline:** 312-742-5OPA (312-742-5672)

**Email:** [OPA@ChicagoParkDistrict.com](mailto:OPA@ChicagoParkDistrict.com)

**Website:** <https://www.ChicagoParkDistrict.com/OPA>