

**Warwick Police  
Department**

Warwick Police Department  
99 Veterans Memorial Drive  
Warwick RI 02886

Phone: (401) 4684200  
Fax: (401) 4684327

2014

---

# **Equal Employment Opportunity Plan**

---



---

*Warwick Police Department's strategy to implement and maintain an effective plan to ensure the full and equal participation of men and women in the workforce, regardless of race, religion, handicap, age or national origin.*

## Introduction

**Agency:** Warwick Police Department  
99 Veterans Memorial Drive  
Warwick, RI 02886

**Grant Title/Number/Funding Level:**

- 1.) **FY-2010 Edward Byrne Memorial**  
RI Pass through JAG Grant  
2010-DJ-BX-0392  
\$36,620
- 2.) **FY-2010 Edward Byrne Memorial**  
JAG (Local Solicitation)  
2010-DJ-BX-0842  
\$37,148
- 3.) **FY-2010 Bullet Proof Vest**  
Partnership Grant  
2010BUBX04022867
- 4.) **FY-2011 Edward Byrne Memorial**  
JAG (Local Solicitation)  
2011-DJ-BX-2266  
\$29,222
- 5.) **FY-2011 Edward Byrne Memorial**  
RI Pass through JAG Grant  
2011-DJ-BX-2873  
\$29,690
- 6.) **FY-2011 Bullet Proof Vest**  
Partnership Grant  
2011BUBX04022867

- 7.) **FY-2012 Edward Byrne Memorial**  
JAG (Local Solicitation)  
2012-DJ-BX-0615  
\$20,943
- 8.) **FY-2012 Edward Byrne Memorial**  
RI Pass through JAG Grant  
2012-DJ-BX-0323  
\$26,655
- 9.) **FY-2012 Bullet Proof Vest**  
Partnership Grant  
2012BUBX04022867
- 10.) **FY-2012 COPS Hiring**  
Grant Program  
2012UMWX0159
- 11.) **FY-2013 Edward Byrne Memorial**  
JAG (Local Solicitation)  
2013-CJ-BX-0270  
\$20,044
- 12.) **FY-2013 Edward Byrne Memorial**  
RI Pass through JAG Grant  
2013-DJ-BX-0057  
\$27,764


**Police Executive Officer:** Colonel Stephen M. McCartney  
Chief of Police

**City Executive Officer:** Mayor Scott Avedisian

**Grant Manager:** Sergeant Lori Michailides Phone: (401) 468-4321

**EEOP Date:** January 15, 2014

**EEOP effective duration:** January 15, 2014 thru January 15, 2016

  
Stephen M. McCartney  
Colonel  
Chief of Police

## **WARWICK POLICE DEPARTMENT MISSION STATEMENT**

*Creating a Partnership With the Community to Provide Quality Policing for the Protection of Life and Property, the Investigation and Prevention of Crime, and the Maintenance of Public Safety.*

## **WARWICK POLICE DEPARTMENT EEO POLICY STATEMENT**

It is the express policy of the Warwick Police Department to:

- Recruit, select, hire, train, retain, and promote the most qualified persons available without regard to race, color, religion, sex, age, disability or national origin.
- Base selection, hiring, placement and promotion decisions on valid requirements and criteria that are job related, essential and necessary functions of the job.
- Administer all employment practices including compensation, benefits, promotion, training, tuition assistance, termination, transfer, demotion and reduction-in-force objectively and without regard to race, color, national origin, religion, creed, sex, age or disability.
- Provide, when necessary, reasonable accommodations to applicants' and/or employees' disabilities, when doing so will enable them to successfully perform the essential functions of the job or benefit from training.
- Prohibit retaliatory actions against employees or applicants for employment who make a charge of employment discrimination, testify, assist or participate, in any manner, in a hearing, proceeding or investigation of employment discrimination.
- Assure a work environment free from harassment and discrimination.

## **OBJECTIVE**

The Warwick Police Department acknowledges that the race, color, religion, sex, national origin, handicap, or age of an individual should not serve as a barrier to his or her equal opportunity for employment.

State and Federal laws and regulations bar discrimination in employment. Notably, the Equal Pay Act of 1963, the Civil Rights Act of 1964, Presidential Executive Order 11246, the Age Discrimination Act of 1969, Title IX of the Education Amendments of 1972, and Section 504 of the Rehabilitation Act of 1973 prohibit employment discrimination based on race, color, religion, sex, national origin, age, or handicap. Under the 1972 amendments to Title VII of the Civil Rights Act of 1964, coverage was extended to all state and local governments, governmental agencies and political subdivisions. The Americans with Disabilities Act of 1990 prohibits employment discrimination against qualified individuals with disabilities.

The Warwick Police Department recognizes that the mere elimination of discriminatory barriers to employment is often not in itself sufficient to provide equal opportunities. Consciously or unconsciously, practices or conditions may exist which adversely affect the employment opportunities of entire groups of people, most notably women, members of minority groups, and handicapped persons.

A plan for equal employment opportunity will be adopted by the Warwick Police Department to support and fulfill the City of Warwick's commitment to equal employment opportunity through positive and aggressive measures.

As part of its Equal Employment Opportunity Plan, the Warwick Police Department will develop, implement and maintain specific, comprehensive plans relating to the recruitment, selection, promotion, training and retainment of personnel, which set specific, measurable goals throughout the agency. This plan shall ensure greater utilization of all persons by identifying the underutilized groups in the workforce and making special efforts to increase their participation.

Part

**2**

## Equal Employment Opportunity Plan

### **WORKFORCE ANALYSIS**

#### **Analysis of Service Population and Department Composition**

##### A. Data Analysis

Table A provides an analysis of the population make up by the variable of race based upon the 2010 Census, the most recent data available. The dominant racial group living within the service area (City of Warwick), and the recruitment area (State of Rhode Island), is whites. Whites constitute 92.7% of the city population and 81.4% of the state population. Given the predominance of whites, there is no other dominant minority group. Blacks or African Americans account for 1.7 % of the service population. Asian/Pacific Islanders account for 2.3% of the service population. Total minority population for the City of Warwick is approximately 8%.

**TABLE A**

**Census Profile of Population by Race**

Source: 2010 Census

<b>Population by Race</b>	<b>City of Warwick</b>		<b>State of Rhode Island</b>	
	<b>Number</b>	<b>Percentage</b>	<b>Number</b>	<b>Percentage</b>
White	76,643	92.7 %	856,869	81.4 %
Black	1,387	1.7 %	60,189	5.7 %
Native American	235	.3 %	6,058	.6 %
Asian/Pacific Islander	1,864	2.3 %	30,457	2.9 %
*Hispanic	*2,827	*3.4 %	*130,655	*12.4 %
Other Race	912	1.1 %	63,653	6 %
<b>TOTAL MINORITIES</b>	7,225	8.8 %	291,012	27.6%
<b>TOTAL POPULATION</b>	<b>82,672</b>	<b>100 %</b>	<b>1,052,567</b>	<b>100 %</b>
Two or more Races	1,611	1.9 %	34,787	3.3%

\*The Census Bureau does not consider Hispanic a race, but rather an ethnic group.

**TABLE B**

**Warwick Police Department Personnel by Race**

(As of 01-15-2014)

<b>Personnel by Race or Ethnic Group</b>	<b>Number</b>	<b>Percentage *</b>
White	205	94.04%
Hispanic	4	1.83%
Native American	3	1.38%
Black	2	.92%
Asian/Pacific Islander	4	1.83%
<b>TOTAL MINORITIES</b>	13	5.96%
<b>TOTAL PERSONNEL</b>	218	100 %

\* Percentage - approximate

Table B represents the composition of the Warwick Police Department by the variable of race.



**TABLE C**

**Ratio of Minority Employees**

<b>Race</b>	<b>Percentage of Service Pop.</b>	<b>Percentage of Employees.</b>	<b>Difference in Percentage</b>
White	92.7%	94.04%	+1.34%
Hispanic	*3.4%	*1.83%	*-1.57%
Black	1.7%	.92%	-0.78%
Native American	0.3%	1.38%	+1.08%
Asian/Pacific Islander	2.3%	1.83%	-.47%
<b>TOTAL MINORITIES</b>	<b>7.7%</b>	<b>5.96%</b>	<b>-1.74 %</b>

\*The Census Bureau does not consider Hispanic a race but an ethnic group.

Table C represents the ratio of minority employees of the Warwick Police Department in relation to the make-up of the service population.

**TABLE D**

**Labor Force Status of Population by Sex**

Source: RI Dept. Of Labor, 2010 Census

<b>Population of Work Force by Sex</b>	<b>Civilian Labor Force</b>	<b>Percent of Total</b>
Male	275,321	50%
Female	275,693	50%
<b>RI Work Force TOTAL</b>	<b>551,014</b>	<b>100.00 %</b>

**TABLE E**

<b>Rhode Island Labor Force Statistics</b>						
<b>Summary of Detailed Occupations Universe: Civilian labor force</b>	<u>Total Male</u>	Male As a % of Labor Force	Male As a % of Occupation	Total Female Occupation	Female As a % of Labor Force	Female As a % of Occupation
<b>Total Labor Force</b>	241,393	50%	50%	249,571	50%	50%
<b>Management Occupations</b>	24,793	5.04%	57.1%	18,660	3.80%	42.9%
<b>Business &amp; Financial Operations Occupations</b>	8,352	1.70%	33.9%	16,288	3.31%	66.1%
<b>Computer &amp; Mathematical Occupations</b>	8,633	1.75%	70.8%	3,566	.72%	29.2%
<b>Architecture &amp; Engineering Occupations</b>	6,141	1.25%	73.4%	2,229	.45%	26.6%
<b>Life, Physical Science, &amp; Social Science</b>	2,776	.56%	71.3%	1,116	.22%	28.7%
<b>Community &amp; Social Services Occupations</b>	1,943	.39%	26.6%	5,359	1.09%	73.4%
<b>Legal Occupations</b>	2,712	.55%	60.1%	1,797	.36%	39.9%
<b>Education, Training, &amp; Library Occupations</b>	12,279	2.50%	35.0%	22,771	4.63%	65.0%
<b>Arts, Design, Entertainment, Sports, &amp; Media Occupations</b>	4,421	.90%	52.1%	4,060	.82%	47.9%
<b>Healthcare Practitioners &amp; Technical Occupations</b>	6,924	1.41%	23%	23,208	4.72%	77%
<b>Healthcare Support Occupations</b>	1,807	.36%	10.7%	15,128	3.08%	89.3%
<b>Protective Service Occupations</b>	7,995	1.62%	78.6%	2,174	.44%	21.4%
<b>Food Preparation &amp; Serving Related Occupations</b>	16,192	3.29%	45.9%	19,057	3.88%	54.1%

<b>Building &amp; Grounds Cleaning &amp; Maintenance Occupations</b>	12,320	2.50%	71.8%	4,833	.98%	28.2%
<b>Personal Care &amp; Service Occupations</b>	5,020	1.02%	30.6%	11,364	2.31%	69.4%
<b>Sales &amp; Related Occupations</b>	25,615	5.21%	49.2%	26,459	5.38%	50.8%
<b>Office &amp; Administrative Support Occupations</b>	16,560	3.37%	23.8%	53,046	10.8%	76.2%
<b>Farming, Fishing, &amp; Forestry Occupations</b>	802	.16%	93.3%	58	.01%	6.7%
<b>Construction &amp; Extraction Occupations</b>	18,121	3.69%	96.7%	616	.12%	3.3%
<b>Installation, Maintenance, &amp; Repair Occupations</b>	13,345	2.71%	93.8%	876	.17%	6.2%
<b>Production Occupations</b>	22,071	4.49%	64%	12,398	2.52%	36.0%
<b>Transportation &amp; Material Moving Occupations</b>	22,571	4.59%	83.4%	4,508	.91%	16.6%

Table F illustrates that the Warwick Police Department has 48 female employees composing 22.02 % of the department.

**TABLE F**

**Warwick Police Department Personnel by Sex**

<b>Population by Sex</b>	<b>Number</b>	<b>Percentage</b>
Male	170	77.98 %
Female	48	22.02 %
<b>TOTAL</b>	<b>218</b>	<b>100 %</b>

Table G analyzes the composition of the Warwick Police Department along the variables of sex, race, and employee category.

**TABLE G**

**Warwick Police Department by Sex, Race and Category** (As of 01/15/2014)

Category	Male				Female			
	White	Black	Hisp.	Other	White	Black	Hisp.	Other
<b>Sworn Personnel</b>								
Executives (Major/Colonel)	4	0	0	0	0	0	0	0
Command (Lt./Capt.)	14	0	0	0	1	0	0	0
Supervisors (Sergeant)	25	0	0	0	3	0	0	0
Officers (Ptl.,Dets,etc)	94	2	3	5	12	0	1	0
<b>Subtotal</b>	<b>137</b>	<b>2</b>	<b>3</b>	<b>5</b>	<b>16</b>	<b>0</b>	<b>1</b>	<b>0</b>
<b>Non-Sworn Personnel</b> <small>*As of 01/15/14</small>								
Officials/Admin	1	0	0	0	0	0	0	0
Professionals	2	0	0	0	3	0	0	0
Technicians	2	0	0	0	0	0	0	0
Para-Prof.	0	0	0	0	0	0	0	0
Administrative Support	13	0	0	0	26	0	0	2
Skilled Craft	4	0	0	0	0	0	0	0
Service Maintenance	1	0	0	0	0	0	0	0
<b>Subtotal</b>	<b>23</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>29</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>TOTAL</b>	<b>160</b>	<b>2</b>	<b>3</b>	<b>5</b>	<b>45</b>	<b>0</b>	<b>1</b>	<b>2</b>

**218 total employees**

**The following observations may be made from Table G.**

1. There are four (4) female officers in command or supervisory positions accounting for 23.53% of total female officers.
2. The department has seventeen (17) female officers, 10.37% of all police officers.
3. The department has thirty (31) non-sworn female employees, 57.41% of all non-sworn employees.
4. There are no minorities in uniform command personnel.
5. There are eleven (11) minority police officers, 6.71% of all police officers.
6. There are two (2) minority non-sworn employees, 3.71 % of all civilian employees

**TABLE H**

**Utilization Table**

Source: RI Dept. of Labor, 2010 Census

**Utilization Analysis**

Job Group Category CLS = Community Labor Statistics		Male Number/Percent Of Occupation		Female Number/Percent Of Occupation		Minorities Number/Percent Of Occupation	
<b>Officials/ Administrators</b>							
Workforce #/%		1	100%	0	0%	0	0%
CLS #/%		24793	57.1%	18660	42.9%	3430	7.9%
Utilization %		<b>+42.9%</b>		<b>-42.9%</b>		<b>-7.9%</b>	
<b>Professionals</b>							
Workforce #/%		2	40%	3	60%	0	0%
CLS #/%		36631	33.3%	73483	66.7%	12936	11.7%
Utilization %		<b>+6.7%</b>		<b>-6.7%</b>		<b>-11.7%</b>	
<b>Technicians</b>							
Workforce #/%		2	100%	0	0%	0	0%
CLS #/%		17550	71.7%	6911	28.3%	4764	19.5%
Utilization %		<b>+28.3%</b>		<b>-28.3%</b>		<b>-19.5%</b>	
<b>Protective Services Sworn</b>	<b>Officials</b>						
	Workforce #/%	43	91%	4	9%	0	0%
	CLS #/%	7,995	78.6%	2174	21.4%	657	6.5%
	Utilization %	<b>+12.04%</b>		<b>-12.4%</b>		<b>-6.5%</b>	
*Based on Warwick Labor Force Statistics.	<b>Patrol Officers</b>						
	Workforce #/%	94	80.3%	12	10.3%	11	9.4%
	CLS #/%	*41229	50.2%	*40938	49.8%	6025	7.3%
	Utilization %	<b>+30.1%</b>		<b>-39.5%</b>		<b>+2.1%</b>	
<b>Protective Services Non- Sworn</b>							
Workforce #/%		18	36.7%	29	59.2%	2	4.1%
CLS #/%		7,995	78.6%	2174	21.4%	657	6.5%
Utilization %		<b>-41.9%</b>		<b>+37.8%</b>		<b>-2.4%</b>	
<b>Administrative Support</b>							
Workforce #/%		13	31.7%	26	63.4%	2	4.9%
CLS #/%		16560	23.8%	53046	76.2%	10904	15.7%
Utilization %		<b>+7.9%</b>		<b>-12.8%</b>		<b>-10.8%</b>	
<b>Skilled Craft</b>							
Workforce #/%		4	100%	0	0%	0	0%
CLS #/%		13345	93.8%	876	6.2%	2513	17.7%
Utilization %		<b>+6.2%</b>		<b>-6.2%</b>		<b>-17.7%</b>	
<b>Service/Maintenance</b>							
Workforce #/%		1	100%	0	0%	0	0%
CLS #/%		12320	71.8%	4833	28.2%	5791	33.8%
Utilization %		<b>+28.2%</b>		<b>-28.2%</b>		<b>-33.8%</b>	

## Underutilization Analysis

- The underutilization analysis was conducted using figures as of January 15, 2014 by the City of Warwick Personnel Department.
- The 2010 Census and Community Labor Statistics were utilized.
- Given the small numbers in several of the job categories (Officials/Administrators [1]; Professionals [5]; & Technicians [2]) it is difficult to determine the true underutilization in each category in comparison to the community labor market. However, several statistics stood out.
  1. A comparison of the Warwick Police Department's workforce to the community labor statistics for the State of RI and the City of Warwick indicate that female employees are underutilized in every category with the exception of one. Females are over utilized in the *Protective Services—Non Sworn* category.
  2. Minority employees are underutilized in every category with the exception of one: *Protective Services Sworn—Patrol Officers* category.
  3. Male employees are underutilized in one category: *Protective Services-- Non-Sworn*.
  4. The Warwick Police Department only employs one individual (male) in the *Service/Maintenance* category.
  5. Female officers are underutilized by 12.4% within the Warwick Police Department's Command Structure, consisting of all ranks above Patrol Officer. Minorities are underutilized by 6.5%
  6. Female entry level Patrol Officers are underutilized by 39.5%, while minorities are over utilized by 2.1%.

## **METHODS OF ENSURING EQUAL OPPORTUNITY**

### **Recruitment and Advertising**

It is the policy of the Warwick Police Department to seek out and employ well-qualified individuals to perform the tasks and functions of the Department to the greatest practical benefit of City residents, businesses, and institutions. Furthermore, it is our policy to treat each person with the respect, dignity and integrity due to him or her as an individual.

The Warwick Police Department prohibits discrimination in all phases of the employer-employee relationship including recruitment, selection, training, retention, promotion, discipline and any other aspect of personnel administration for reasons of political or religious opinion or affiliations; or because of race, color, national origin, physical disability, handicap, sexual orientation, or age (except where physical requirements constitute a bona fide occupational qualification necessary to properly and efficiently function on the job) or any other non-merit factor.

The Warwick Police Department will regularly monitor the composition of its work force and service community to determine if there exists a disparity in the representation of minorities or women in the work force in relationship to their representation in the service community. Where an analysis indicates such a disparity, the Warwick Police Department will take voluntary action to eliminate barriers to equal employment opportunity. The Warwick Police Department reaffirms its commitment to take action to ensure fairness and impartiality in all hiring and employment practices.

In efforts to recruit qualified minorities and women, the Warwick Police Department strives to communicate with these groups in various ways, including annual written affirmation of the Warwick Police Department's commitment to EEO. Recruitment postings sent out to these organizations during recruitment drives to encourage them to refer qualified minorities and women for open positions. The Warwick Police Department will develop, implement and maintain a *Recruitment Policy* specifying specific procedures to be followed during recruitment. The Warwick Police Department's Recruitment Policy will be reviewed and updated continuously to ensure compliance with all applicable State and Federal guidelines. The Recruitment policy will set forth specific measurable methods of advertising and disseminating recruitment information. Methods will be designed to specifically target groups that have been determined to be underutilized by the Warwick Police Department.

### **Employment Procedures**

The Warwick Police Department will explain procedures and policies to all applicants applying for positions in the agency. This will include dissemination of information at recruitment drives to ensure consideration of qualified female and minority applicants in underrepresented categories.



## **Employment and Selection**

The Professional Services Division will review all applications and work with members of the recruitment team to assure appropriate consideration is given to all qualified candidates. Applications will be reviewed for minimum requirements to ensure conformance with State and Federal employment standards. A *Job Task Analysis and Classification Policy* will be developed, implemented and maintained in order to ensure that job requirements are appropriate and continuously updated. This practice will help insure that job requirements are valid for the position being filled. Inflated requirements may rule out under-represented candidates who are in fact capable of performing the job.

## **Training**

A *Training: Organization and Administration Policy* will be developed, implemented and maintained by the Warwick Police Department. The Warwick Police Department will ensure equal access to training regardless of race, gender, national origin, physical disability, handicap, sexual orientation, age, political or religious opinion or affiliations. The Training Policy will incorporate the establishment of a training committee. The training committee will assist in the development and evaluation of the training process to include assurances that equal access to training is afforded to every member of the Warwick Police Department.

## **Promotion**

The Deputy Chief will be responsible for administering promotional examinations in accordance with Section 28 of the Collective Bargaining Agreement between the City of Warwick and Warwick Lodge No. 7.

The Deputy Chief will be responsible for conducting an annual review of the promotional process and making recommendations for revisions if necessary.

Components of the process will be evaluated by the Administrative Bureau Commander for validity and adverse impact as it relates to the underutilization of identified groups.

## **Discrimination Complaints**

Procedures have been developed to resolve those situations where an applicant or employee from a protected class feels that her/his rights have been violated. Applicants and employees may file complaints with the Professional Services Division. All complaints will be investigated. Applicants and employees have the right to file discrimination complaints related to employment practice or procedure with federal, state, or local compliance agencies. Employees are expressly prohibited from retaliating against, or harassing an employee who has filed a discrimination complaint.

## **Sexual Harassment Complaints**

Applicants and employees may file sexual harassment complaints with the Inspection Services Division. All complaints will be investigated. Applicants and employees have the right to file sexual harassment complaints with federal, state, or local compliance agencies. Employees are

expressly prohibited from retaliating against or harassing an employee who has filed a sexual harassment complaint

### **Internal Auditing and Reporting**

Internal audit and reporting of all policies and procedures contained within the Warwick Police Department's Equal Employment Opportunity Plan is accomplished through the offices of the Grant Manager and the Accreditation Manager. Policies will be reviewed, updated, approved and redistributed on a continuous basis. The Professional Services Division will maintain and monitor records on applications, selections, promotions, disciplinary actions and terminations. Monitoring of application, selection and promotional records will include a comprehensive review to ensure a definitive focus on underutilized groups within each job category. Disciplinary and termination records will be monitored to ensure the fair and impartial representation of any underutilized group.

## **DISSEMINATION**

### **Internal Dissemination**

1. The Equal Employment Opportunity Plan will be provided to all employees during the orientation process.
2. The intent of the Equal Employment Opportunity Plan and individual responsibility for the implementation of the plan will be discussed periodically at elected official and department head staff meetings.
3. Periodic meetings will be held with all managers and all supervisory personnel to assure compliance with EEO standards. This will assist managers in identifying problem areas, and in the formulation of effective solutions.
4. Informal discussions will be held with Warwick Police Department employees, as required, regarding the Equal Employment Opportunity Plan.
5. The Equal Employment Opportunity Plan, along with required state and federal EEO notices will be posted on bulletin boards throughout the Warwick Police Department.
6. The necessity for complying with Federal Equal Employment Opportunity regulations will be discussed and communicated in writing with union officials periodically in an effort to secure their understanding and cooperation. All contractual provisions will be reviewed to ensure they are nondiscriminatory.
7. The Warwick Police Department's Equal Employment Opportunity Plan will be disseminated periodically to members of the Warwick Police Department during annual in-service training forums.

### **External Dissemination**

1. The Warwick Police Department's Equal Employment Opportunity Plan will be posted on the department's web site to ensure easy access by members of the community.
2. All employment opportunity announcement forms and recruitment advertising will contain the message: "Equal Opportunity Employer."
3. The Warwick Police Department's employment application will continue to be periodically reviewed to determine compliance with the latest state and federal EEO regulations, to ensure each applicant is provided the maximum opportunity to display her/his related qualifications.
4. Recruiting sources, including non-profit minority and female organizations, will be annually informed in writing of the Warwick Police Department's Equal Employment Opportunity Plan and commitment to recruitment diversity. The Warwick Police Department welcomes suggestions of additional recruiting sources.
5. Job announcements will be distributed to the recruiting sources, encouraging them to refer qualified applicants, and to assist in the implementation of our Equal Employment Opportunity Plan.
6. The Warwick Police Department will be represented at recruitment functions, meetings of community groups, local schools, colleges, and training programs, reasserting the department's commitment to the Equal Employment Opportunity Plan.