

DIVERSITY PLAN AND PROGRAM¹

INTRODUCTION

WGBH is a non-profit educational foundation organized under Chapter 180 of the laws of the Commonwealth of Massachusetts. WGBH is a public media powerhouse, serving New England, the nation, and the world with educationally rich, innovative content across a growing range of platforms: TV, radio, the internet, mobile devices...our reach and impact keep growing. We're also a literal "town square": nearly 130,000 visitors came through our doors in 2017 for screenings, discussions, performances, or tours, or attended WGBH-sponsored events in our community.

Regional Broadcast and Cable TV Services

WGBH is a member station of the Public Broadcasting Service (PBS), with 11 public television services for southern New England:

- WGBH 2
- WGBX 44
- WGBH World
- WGBH Create
- 'GBH Kids
- Boston Kids & Family TV (Comcast and RCN, Boston only)
- WGBY 57 (Springfield, MA)
- WGBY World
- WGBY Kids
- WGBY Create

These offer a mix of programs produced by WGBH for our local audience, programs produced by WGBH for our national audience, and programs acquired from other regional and national sources, including PBS. Many of these programs also may be viewed on wgbh.org and pbs.org.

Regional Radio Services

WGBH is an affiliate of both National Public Radio (NPR) and Public Radio International (PRI). We operate three public radio services:

- 89.7 WGBH, Boston Public Radio
- 99.5 WCRB, Classical Radio

¹The Policies, Plans and Programs set forth in this document are designed to serve as the affirmative action plan required by federal law governing the receipt of federal funds and to meet the requirements of Executive Order 11246, as amended by Executive Order 11375, and governing regulations under it, and to fulfill the Corporation for Public Broadcasting's FY 2013 TV CSG Diversity Eligibility Criteria, Part (A).

- WCAI, the Cape and Island NPR® Station

These offer a mix of programs produced by WGBH for our local audience, programs produced by WGBH for our national audience, and programs acquired from other regional and national sources, including NPR and PRI (an affiliated company of WGBH). All three services stream online on wgbh.org.

Internet and New Media Services

WGBH maintains a rich and vibrant website at wgbh.org. We also are a leading supplier of content to pbs.org, one of the most frequently visited dot-org sites on the Internet. As new media platforms emerge (smartphones, mobile DTV, etc.) WGBH continues to harness their power to reach audiences in new ways, offering more choice and convenience.

Other Educational and Accessibility Services

We extend our reach and impact with educational multimedia used by teachers and parents and with broad-based community outreach activities. We pioneered captioning for audiences with hearing loss and DVS (the Descriptive Video Service) for people who are blind or low-vision, and we continue to break new ground in media access for people with disabilities.

As of December 31, 2017, WGBH staff was comprised of six main groups:

- 1) Executives: Employees who set broad policies, exercise over-all responsibility for execution of these policies
- 2) Managers: Employees who execute policies and direct individual departments or special phases of the Foundation's operation;
- 3) Professionals: Employees who work mainly in the areas of writing, preparation and production of programming;
- 4) Technicians: Employees whose positions require a combination of basic technical knowledge and manual skills, such as audio and video engineers, camerapersons, master control engineers, maintenance engineers and radio engineers;
- 5) Administrative Support: Employees doing all clerical type work, including bookkeepers, assistants, and secretaries;
- 6) Service Workers: Employees who perform physical plant service work.

SECTION I

Equal Employment and Diversity Policy Statement

WGBH is an equal opportunity employer and is committed to creating and supporting a workplace environment that leverages the potential and diversity of the entire staff. The community and audience we serve are diverse, and we wish to foster that diversity in our workplace. Toward that end, WGBH does not discriminate against individuals in hiring, employment or promotion on the basis of race, religion, color, sex/gender, gender identity and gender expression, age, marital status, national origin, sexual orientation, citizenship, handicap or disability, veteran or military status, political belief, pregnancy, genetic information or any other characteristic protected by law. We foster programs and services that positively reflect and meet the needs of a diversity inclusive workplace in which everyone has the opportunity to fully participate and is valued for their distinctive skills, experiences and perspectives.

The Foundation considers this policy an integral aspect of the mission and functioning of the organization. In commitment to this policy and as part of our Diversity Plan, we shall:

- 1) Recruit, hire, train and promote persons in all job levels without regard to race, religion, color, sex/gender, gender identity and gender expression, age, marital status, national origin, sexual orientation, citizenship, handicap or disability, veteran or military status, political belief, pregnancy, genetic information or any other characteristic protected by law;
- 2) Base decisions on employment so as to further the principle of equal employment opportunity;
- 3) Ensure that promotion decisions are in accord with the principles of equal employment opportunity and are based solely on valid requirements for promotional opportunities;
- 4) Ensure that all other employment actions including compensation, benefits, transfers and layoffs will be administered without regard to race, religion, color, sex/gender, gender identity and gender expression, age, marital status, national origin, sexual orientation, citizenship, handicap or disability, veteran or military status, political belief, pregnancy, genetic information or any other characteristic protected by law.

In keeping with these commitments, WGBH regularly analyzes all employment actions to ensure equal employment opportunity for all individuals. Management performance on this program will be monitored as is performance on other goals and objectives.

Vice President of Human Resources, Fran Sullivan, serves as the EEO Officer, and working with the executive leadership team, will ensure that the intent and practice of this policy is carried out. However, all staff members having administrative and supervisory authority are responsible for the day-to-day employment activities necessary for full policy and program compliance. Therefore, the ultimate responsibility for fulfilling the intent of this policy lies with every member of top management, every department head, Executive Producer, Producer and officer of the organization.

SECTION II

All of the existing policies in employment matters at WGBH have been designed with the intention of contributing to the accomplishment of its affirmative action obligations. The most important policies in this regard are the following:

A. Recruitment

Recruitment is conducted in a number of different ways:

- 1) For all positions, WGBH advertises on web sites such as Indeed.com, LinkedIn, Monster.com, MediaBistro.com, Hireculture.com, and its organizational web site, www.wgbh.org.
- 2) WGBH's Human Resources Department ("HR") has established relationships with employment agencies and referral sources recognized for their capability, experience, and success with recruitment of protected class members for the types of positions available at WGBH. WGBH updates its list of referral sources as new information becomes available. (See Appendix A.)
- 3) WGBH deals only with employment sources that refer job candidates without regard to race, religion, color, sex/gender, gender identity and gender expression, age, marital status, national origin, sexual orientation, citizenship, handicap or disability, veteran or military status, political belief, pregnancy, genetic information or any other characteristic protected by law.
- 4) The HR department encourages all staff to seek out and refer members of the protected classes as potential employees.
- 5) All job opening notices are posted to WGBH's organizational web site, which is accessible to all employees through WGBH's internal intranet, InnerTube, and

through internet access available throughout the building and at employees' desks/workspaces.

- 6) WGBH sends representatives to local events where there are opportunities to meet potential candidates or those who can identify potential candidates. WGBH also sends representatives to national public media events where there are opportunities to network and identify potential candidates. (See Appendix B.)
- 7) From time to time, HR retains employment agencies, search firms and consultants to help locate qualified diverse candidates.

B. Selection and Hiring

- 1) HR, with the assistance of appropriate department heads, has the responsibility for ensuring that the qualifications and skills set forth in all job descriptions are realistic and do not inadvertently exclude protected class members.
- 2) No pre-employment tests or selection criteria are used that have the effect of discrimination against any class of qualified employees.
- 3) WGBH's HR Talent Acquisition Manager ensures that for each position, any qualified diverse applicant is considered and interviewed by the hiring manager. The hiring manager's evaluation of the candidate is discussed to ensure that there is no inappropriate bias inadvertently playing into a hiring decision.

C. Performance Reviews, Promotions and Transfers

- 1) WGBH has a performance review system that is designed to (i) focus on competencies that are important to the Foundation's success and an employee's performance in those competencies; (ii) identify specific goals given for a year and to measure performance against those goals; and (iii) identify high potential employees so that the organization can ensure that it invests in and retains talent.

The competencies were developed by a working group consisting of diverse employees and HR, and then reviewed and modified by the executive leadership team. The competencies were reviewed to ensure that they did not have unintended implications for diverse employees. Periodically, the competencies

are refined in response to changing business needs and/or feedback from managers and employees.

Pursuant to the review system, all employees' performance is reviewed annually at a specified time. The process is as follows:

- An employee conducts a self-review of his/her performance relative to the competencies and goals that were established for the year.
- The manager also requests feedback from colleagues and clients of the employee and, for managers, to their subordinates. This feedback received is referred to as "community feedback."
- The manager then writes a review of the employee, considering his/her assessment of the employee's performance, the employee's assessment, and the feedback received from colleagues and others; managers consult with their department and division heads for guidance as needed.
- Once reviews of all employees have been prepared, the executive leadership team meets to review the performance ratings to ensure that standards are applied consistently and that the organization is aware of and working to promote high potential employees. During this review, the executive leadership team also reviews any situation that may suggest inappropriate bias.
- After the executive review is completed, division leaders work with managers to make any adjustments needed.
- Performance review meetings are conducted by the employee's immediate supervisor and include a discussion of goals for the next year.
- Employees who disagree with their reviews are permitted to submit written rebuttals to reviews; these are included the supervisor's review and become part of the employee's personnel file as defined by applicable law.
- Employees may also speak confidentially with representatives from Human Resources about a performance review and/or with executive management who maintains an open door policy.
- Over the course of the year, managers are expected to provide regular feedback to employees about how they are performing relative to the goals established and the competencies. Managers are also expected to provide information and coaching, and to listen to employee concerns, including concerns about how the manager is managing. HR proactively works with managers and employees to help them maximize the effectiveness of this ongoing dialogue.

- 2) When selecting candidates for positions, managers are encouraged to consider any internal candidates without regard to race, religion, color, sex/gender, gender identity and gender expression, age, marital status, national origin, sexual orientation, citizenship, handicap or disability, veteran or military status, political belief, pregnancy, genetic information or any other characteristic protected by law.
- 3) When evaluating proposed candidates for promotion, the candidates' previous performance reviews are considered. Each proposed promotion is reviewed to ensure equal employment opportunity. No commitment for promotion, verbal or otherwise, may be made to any staff member before an employment requisition has been approved by the Vice President of HR, or her designee, and the Chief Operating Officer.

D. Training

- 1) WGBH offers training to all employees as possible within the Foundation's budget. WGBH also looks for, and where possible, applies for grants to support training. Training over the past year, a list of which is attached as Appendix C, focused on general and specialized skill development as well as general management skills.
- 2) WGBH cooperates with the work/study and internship programs of local educational institutions. WGBH provides opportunities to interns and work/study students throughout the year, and regularly hires interns and work/study students into open positions.
- 3) WGBH has an Educational Assistance Program, offering financial assistance to full-time employees who wish to take job-related courses to improve their opportunities for promotion or job growth.
- 4) WGBH offers internal professional development programs for both management and individual contributor employees—the Management Roundtable and the Collaborative Leadership Exchange.
- 5) WGBH maintains a policy titled the "Respectful Workplace Policy" prohibiting discrimination and retaliation on the basis of race, religion, color, sex/gender, gender identity and gender expression, age, marital status, national origin, sexual orientation, citizenship, handicap or disability, veteran or military status, political belief, pregnancy, genetic information or any other characteristic protected by

law. All employees receive the policy annually and are periodically trained on the policy. A copy of the policy is attached as Appendix D.

E. Layoff and Recall

The Foundation ensures that decisions to terminate employment or eliminate positions are without regard to race, religion, color, sex/gender, gender identity and gender expression, age, marital status, national origin, sexual orientation, citizenship, handicap or disability, veteran or military status, political belief, pregnancy, genetic information or any other characteristic protected by law. Layoff and recall policies which are consistent with the Foundation's approach have been negotiated through collective bargaining with unions representing our staff, including AEEF/CWA and NABET.

F. Parental Leave, Leaves of Absence for Disability or Medical Reasons, Accommodation of Disabilities

WGBH offers paid parental leave. WGBH also offers leaves of absence for employees to address medical concerns, and accommodates employees' disabilities. WGBH policies are posted on its internal web site, InnerTube.

WGBH has also negotiated for such policies to apply to employees represented by unions.

SECTION III

EEO Policy Dissemination

A. Internal Dissemination of EEO Policy

- 1) EEO notices are prominently displayed on bulletin boards in WGBH where employees frequently pass and where applicants will come. A copy of the notice is available from the HR department.
- 2) Notices of WGBH's EEO policy appear on its Careers web site and on its employment application forms.
- 3) EEO policies and procedures, including the Foundation's Respectful Workplace Policy, are made available to all employees when hired.
- 4) All collective bargaining agreements with unions representing staff include the Foundation's commitment to equal employment opportunity.

B. External Dissemination of WGBH's EEO Policy

WGBH's EEO policy appears on its web site.

C. Dissemination of EEO Policy in the Recruitment and Employment Process

- 1) As described above in Section II (A), WGBH advertises its open positions externally and internally to ensure the widest possible circulation for job openings. The use of media and journals aimed at members of the protected class, and the use of the phrase "Equal Employment Opportunity Employer" are further designed to disseminate and implement a strong EEO recruitment posture.
- 2) WGBH posts its EEO policy and Respectful Workplace Policy on its internal web site and its EEO policy on its external web site so that applicants and employees are aware of its benefits.
- 3) WGBH's employment application form requests information concerning the source of the referral. This information will enable WGBH to evaluate the effectiveness of its recruitment sources and its advertising.
- 4) WGBH invites all applicants to self-identify membership in a protected class so that the Foundation can measure its progress pursuant to this Diversity Plan and also take steps consistent with this Plan. Any information received for this purpose is kept confidential, applicants are under no obligation to take advantage of this opportunity, and the Foundation does not use this information to discriminate unlawfully against such applicants if they become employees.
- 5) The WGBH web site notes that WGBH is an EEO employer.
- 6) WGBH reports its EEO progress to the Federal Communications Commission every year and posts its report on its external web site.

SECTION IV

Responsibility for this Diversity Plan and Affirmative Action

The Foundation's commitment to affirmative action requires that all employees, at every level, be committed to taking whatever measures are appropriate in light of their positions. The following individuals are the ones with the most detailed specific responsibilities.

The President and Chief Executive Officer

The President and Chief Executive Officer assumes final responsibility for WGBH's affirmative action efforts and policies. Progress on diversity efforts is reported annually to the Foundation's Board of Trustees.

The EEO Officer/Vice President of Human Resources

Operational authority and responsibility for the implementation, administration and monitoring of the Foundation's affirmative action activities and equal employment opportunity policy is designated to the Foundation's VP of Human Resources, who acts as the Foundation's EEO Officer. She has a broad responsibility for the formulation of plans and activities, the supervision of compliance reviews and other government agency inquiries pertaining to equal employment opportunity efforts, and the initiation of corrective action when required. The VP of HR reports to the Foundation's Executive Vice President and Chief Operating Officer, who in turn reports to the President and CEO.

The EEO Officer will:

- 1) Develop annual diversity programs.
- 2) Design and implement programs which will advance the Foundation's objectives in the areas of affirmative action and diversity.
- 3) Review, analyze and report on Foundation policy, practices and progress in the area of EEO, diversity and affirmative action.
- 4) Keep supervisors informed of the latest and pending developments in the area of equal employment opportunity resulting from new or pending legislation, court opinions and rulings.
- 5) Assist management in identifying deficiencies through audits and correcting such deficiencies through program and policy design.

- 6) Receive, investigate and assist in the resolution of internal discrimination complaints which are unresolved by local supervision.
- 7) Monitor affirmative action/diversity efforts and adherence to the EEO policy.
- 8) Provide counsel for employees and management on EEO and affirmative action/diversity matters.
- 9) Participate in complaint reviews and government agency inquiries.
- 10) Encourage the application of protected class members for the Corporation for Public Broadcasting (CPB) and other applicable grants and work with appropriate persons to administer such grants.
- 11) Implement affirmative action policies when so required.

Complaints regarding discrimination or retaliation on the basis of protected characteristics are handled in accordance with the Foundation's Respectful Workplace Policy. Also, any employee is encouraged to discuss thoughts or concerns regarding these issues with their supervisor, any manager or executive, and HR. Staff employees represented by unions are also able to pursue grievances concerning EEO matters through the dispute resolution procedures set forth in their collective bargaining agreements.

SECTION V

Workforce Analysis

As the first step in conducting a utilization analysis, the Foundation has prepared a workforce analysis. This analysis is contained in an electronic Excel workbook maintained in HR. (See *Organizational Structure Data for Diversity Plan CY17.xls*)

All jobs across the Foundation were analyzed to determine which jobs could reasonably be said to have similar content, wage rates and opportunities. That process identified 6 Foundation-wide job groups. Those groups aligned with the EEO classifications within each job group are listed in Table V-1 Job Group Analysis. This data provides a summary of job groups and EEO classifications.

SECTION VI

Availability of Members of Protected Classes

The Foundation has also conducted an availability analysis to provide an estimated baseline for determining whether there is any reason to suspect that protected categories are being underutilized in particular job groups.

A. In determining whether minorities are being underutilized in any job group, WGBH considers at least all of the following factors:

- 1) The minority population of the labor area surrounding WGBH's facility (also referred to as the immediate area);²
- 2) The percentage of the minority workforce as compared with the total workforce in the immediate area;
- 3) The general availability of minorities having requisite skills and educational requirements in the immediate area;
- 4) The availability of minorities having requisite skills in an area in which the Foundation can reasonably recruit;
- 5) The availability of promotable and transferable minorities (even if training is required) within the employ of the Foundation.³

B. In determining whether women are being underutilized in any job group, WGBH considers at least all of the following factors:

- 1) The percentage of the female workforce as compared with the total workforce in the immediate area;
- 2) The general availability of women having requisite skills in the immediate area;
- 3) The availability of women having skills in an area in which the Foundation can reasonably recruit;

² The Foundation has considered both availability in the Boston metropolitan area and nationally but local market data was used in defining targets because targets were higher and more specific to position education requirements.

³ The Foundation does not have defined job paths that it can use to identify "promotable candidates" or systems that would allow it to identify such employees. However, the number of minority employees would not statistically impact the availability figure, and WGBH far exceeds availability with its female employee population. Further, given the size of our minority population, we think it is important to add to that population to meet our targets—promotion would not meet our overall targets (though we will certainly promote employees as warranted).

- 4) The availability of women seeking employment in the labor or recruitment area of the Foundation;
- 5) The availability of promotable and transferable female employees within the employ of the Foundation³.

The purpose of these availability estimates is to provide a basis for determining whether the current workforce is consistent with minority and female participation in the overall workforce. When the workforce analysis is compared with the availability data it is possible to determine where minority and female employment is not, as predicted, at the level which might be expected based on their estimated availabilities.

SECTION VII

Utilization Analysis and Identification of Problem Areas

A. Utilization Analysis

The utilization analysis is, in its simplest terms, a comparison between the percentages of minority and female workers employed at a particular point in time in certain job groups, and the best estimates of their availability based on available current data. The major benefits of the utilization analysis are:

- (1) It can indicate those areas in which women and minorities appear to be underutilized when compared with estimated percentages in the workforce;
- (2) It serves as the basis for establishing goals; and
- (3) It identifies areas where a more concentrated effort in recruiting, appointment and job training might be valuable. In general terms, a utilization analysis identifies areas where more affirmative action may be appropriate.

It is equally important to define what a utilization analysis does not do. Most importantly, it is not intended to point out areas at WGBH where women and minorities are being subjected to discrimination. Any identification of an area where underutilization appears to exist should not be interpreted as evidence of unlawful discrimination. It is also not intended to set an employment quota for these protected classes.

The Foundation has conducted a utilization analysis for each job group. It lists the total number of employees within the job group, and the number of minority and female employees. The minority and female employment is then compared to what the figures would be expected to be by applying the availability estimates to the total employment to determine “expected” employment for minority and female workers. For purposes of this utilization analysis, underutilization is defined as any discrepancy between current employment and availability estimates which would require the addition of more than one half of a female or minority employee to rectify.

The Foundation’s utilization analysis by job group is contained within Table V – 2, Utilization Analysis.

B. Analysis of Utilization and Identification of Problem Areas

Overall, WGBH has done an excellent job in its diversity efforts with regard to the employment of both females and minorities in most categories, there are opportunities for further effort in those job groups where females and minorities appear to be underutilized.

The utilization analysis identifies apparent underutilization of females and/or minorities in the following job groups:

Females: Executive, Technician, Service

Minorities: Manager, Service

Appropriate goals are defined in the next section in the areas where females and minorities appear to be underutilized and where hiring opportunities (turnover/growth) are anticipated within the next year.

C. Hiring, Promotion and Compensation

As indicated in our discussion in Sections II(B)(2) and II(C)(3), we have not identified any aspects of our hiring, promotion or compensation system that negatively impact diversity.

SECTION VIII

Goals and Timetables

Based on the utilization analysis above, WGBH has established goals and timetables to address areas where underutilization may exist. It is important to recognize that a goal is not a rigid and inflexible quota which must be met, but is a target reasonably attainable by means of applying every good faith effort to make all aspects of the entire Diversity Plan work.

The goals in this plan have been established for CY18. The goals are based on estimates of the employment opportunities which are expected during this year. It is recognized, however, that economic and other trends may result in fewer employment opportunities than anticipated, which make the goals no longer attainable. In any event, the goals can and should be revised over time to reflect changed circumstances, if necessary and appropriate.

WGBH's goals are to have a broad representation in all aspects of our staff, especially in the content areas to ensure that our basic mission of producing and broadcasting programs is satisfied by balanced programming. Our goals also include improvement of any underutilization identified through the analysis described above.

We recognize that we face unusual obstacles in controlling the hiring process. As an organization, we experience moderate to low turnover. Also, the nature of production and our business means that regularly, producers make independent hiring decisions to meet short deadlines due to tight production schedules and expertise requirements. The pool of qualified applicants can sometimes be very small because of unique background requirements for creating specialized content and because national broadcast and film production talent is not widely available in the Boston metro market. As a non-profit institution, we are limited in our ability to compete with the very robust commercial media world and many of our competitors on a salary basis. Therefore, we will have to make special efforts to progress toward these goals.

The following table reflects the number of female and/or minority employees that the Foundation would have to hire to eliminate apparent underutilization. For purposes of this calculation, fractions have been rounded to the nearest whole number:

Female by Job Group	CY17 WGBH %	Market %	Gap	Hires to Close Gap	Minority by Job Group	CY17 WGBH %	Market %	Gap	Hires to Close Gap
Executive:	35%	53%	-18%	3	Executive:	17%	16%	1%	n/a
Manager:	60%	53%	7%	n/a	Manager:	9%	16%	-7%	15
Professional:	63%	53%	10%	n/a	Professional:	18%	16%	n/a	n/a
Administrative:	65%	53%	12%	n/a	Administrative:	21%	18%	n/a	n/a
Technician:	29%	53%	-24%	26	Technician:	18%	16%	n/a	n/a
Service:	0%	53%	-53%	4	Service:	14%	18%	-4%	1

Because of the relatively small number of anticipated vacancies in some of the job groups, it will not be possible to rectify all of the apparent underutilization during CY18. However, we do anticipate that progress will be made in a number of areas. In setting these priorities, we have attempted to establish specific goals which we believe are reasonably attainable.

After taking all these factors into account, WGBH has established the following CY18 goals for those job groups where apparent underutilization has been identified. A percentage goal has been identified in each job group and a numerical goal has been developed where there are sufficient anticipated vacancies to achieve the goal:

Female by Job Group	CY18 % Goal	CY18 # Goal	Minority by Job Group	CY18 % Goal	CY18 # Goal
Executive:	47%	2	Executive:	n/a ⁴	n/a ⁴
Manager:	n/a ⁴	n/a ⁴	Manager:	12%	7
Professional:	n/a ⁴	n/a ⁴	Professional:	n/a ⁴	n/a ⁴
Administrative:	n/a ⁴	n/a ⁴	Administrative:	n/a ⁴	n/a ⁴
Technician:	32%	3	Technician:	n/a ⁴	n/a ⁴
Service:	15%	1	Service:	29%	1

⁴Currently meeting or exceeding utilization goals.

SECTION IX

Development of Action Plans and Programs

A. Recruitment and Promotion

We will continue our current recruitment and promotion practices. We will evaluate the web sites where we post open positions quarterly to determine if there are additional sites that could be added to increase our pool of diverse candidates and update the list accordingly.

We will continue to include a diverse pool of candidates in our selection of interns and cooperative education students and strengthen the connection between diverse participants in these programs and our candidate slates and hiring pipeline for staff and contract positions.

We will continue to make sure that managers interview any diverse candidates who are qualified to perform the duties of an open position.

B. Support of Diverse Employees

We will be increasing our efforts to promote a workplace where diverse employees thrive and choose to stay through the following measures:

- 1) Gathering information and feedback on how we can improve the workplace to support diversity

The VP of HR, along with her designees, will meet with groups of employees across the organization to hear their feedback about working at WGBH, including communication, management, ability to share ideas and thoughts (all of which go toward whether diversity is supported), and diversity. She will then work with the executive leadership team to assess whether specific steps should be taken, in addition to those described below, that would help the organization better support diversity.

- 2) Support a group focused on diversity within the organization

A small number of employees within the organization have expressed interest in discussing and exploring how to promote diversity in our workplace. We will explore interest in forming a working group that explores employee thoughts about diversity in our workplace and how to foster it. Others may be invited to join the group, based on the discussions identified in subparagraph (1) above.

- 3) Encourage employees to form affinity groups

In the past, employees in the organization formed affinity groups. Over time, those groups dissolved due to lack of employee interest. We will explore whether there is interest in creating affinity groups and if so, support that interest. We believe affinity groups will only be successful if they are employee driven, so we do not believe it would be effective for management to create them without an indication of employee interest.

- 4) Strengthen relationships with community organizations focused on diversity.

In conjunction with internal affinity groups, we will identify and strengthen the Foundation's affiliation with organizations focused on diversity within the metro Boston community.

- 5) Conduct mandatory Respectful Workplace Policy training for all employees.

We will conduct a mandatory training for all employees and managers on the Respectful Workplace Policy.

- 6) Dissemination of this Diversity Plan and Program

We will post our Diversity Plan and Program on our internal web site, InnerTube, and external web site, wgbh.org. We will also educate managers about the program and their responsibilities.

- 7) Handling of complaints regarding EEO issues

We will continue to handle complaints regarding EEO issues through the process outlined in our Respectful Workplace Policy as we believe it has been effective to date.

- 8) Performance reviews

We will explore how to incorporate evaluation of an employee's efforts to promote diversity into our performance review program. We believe that some aspects of our review already touch on these issues—such as our competencies concerning teamwork and change. We will determine whether there are ways to further evaluate aspects of an employee's performance that would go toward diversity and adapt our evaluation process accordingly.

SECTION X

Internal Monitoring and Audit

A. Data Maintenance and Reporting

- 1) Each quarter, the VP of HR will have the EEO information on protected classes updated, including statistics on hiring, promotions, and departures. These statistics will be used by management and the HR department to monitor EEO progress toward goals.
- 2) Each quarter, the VP of HR will review progress on this plan with the Chief Operating Officer and discuss whether adjustments should be made.
- 3) An exit interview is conducted with each departing employee, and logs are kept of this information. If these interviews suggest a trending problem in a given manager's ability to manage, hire or develop employees, or a failure to openly support our diversity and other workplace policies, that information will

immediately be reviewed by executive management and steps to address the problem will be taken.

B. Hiring and Promotion

If at any time, the HR department believes that a manager has failed to consider diversity goals in the course of hiring a position, the issue will be discussed with the manager. If the manager does not consider the diversity goals, the VP of HR will discuss the concern with the manager's VP.

Also, as applicable, issues will be considered and explored through the Foundation's Respectful Workplace Policy in accordance with the procedure set forth therein.

C. Workplace Support

The VP of HR will monitor the progress of the actions identified to promote a more supportive workplace and will discuss progress regularly with the Chief Operating Officer.

In addition, pursuant to the Foundation's Respectful Workplace Policy, employees may report concerns and those concerns will be investigated pursuant to the procedure set forth therein.

SECTION XI

Review of Diversity Plan and Program and Modification

This Diversity Plan and Program will be reviewed and modified annually. Results will be shared with executive management and reported to the Foundation's Board of Trustees. The new plan will be shared with employees and the public via the Foundation's internet site.

Appendix A – Employment Agencies/Referral Sources

Employment Agencies/Referral Sources

Bentley College	Jewish Vocational Service	Boston University
Boston College	Babson College	Emerson College
UMASS Boston	Newbury College	Simmons College
Benjamin Franklin's Institute of Technology	Massachusetts College of Art and Design	Jobs and Community Services – City of Boston
Berklee College of Music	Worcester Polytechnic Institute	Lesley University
Bay State College	Wentworth Institute of Technology	Department of Career Services – Massachusetts
Brandeis University	Urban League of Eastern Massachusetts	Boston Redevelopment Authority
US Department of Veteran Affairs	The Partnership Inc.	City of Cambridge, MA
Career Works	US Department of Labor	Centro Latino Inc.
University of Rhode Island	Asian American Resource Workshop	Latino Professional Network
Bristol Community College	National Association of Professional Women	Association of Independents in Radio
Jobs Clearinghouse	The Ad Club of Boston	Boston Private Industry Council
Action for Boston Community Development	Northeastern University	Allston Brighton Community Development Corporation
Enable Inc.	Harvard University	Bunker Hill Community College
Mount Ida College	La Alianza Hispana	University of Massachusetts – Boston
Workforce Central	Asian American Journalists Association	The Workplace
Collette Phillips Communications	iHispano	Black Career Network
Woman's Career Channel	Military2Career	ProAble
OutProNet	NAACP	Latinos in Information and Science Technology

National Hispanic Sales Network	Illinois Hispanic Nurses Association	Black Data Processing Associates
Greek Diversity	Association of Latinos in Finance, Accounting and Business	Hispanic Alliance Career Enhancement
National Association of Hispanic Journalists	Hire Veterans	Vet Jobs
Ebony	Wall Street Warfighters Foundation	Women in Bio
National Urban League	Veteran's Exchange	National Able Network
National Association of African Americans in Human Resources	The Griot	

Appendix B – Networking Events

Networking Events

Organization	Contact(s)	Event
Bryant University	Barbara Currier Gregory <i>Associate Director/Manager,</i> Academic Internship Program Amica Center for Career Education bgregory@bryant.edu	Working partnership; Recruitment; Work with student groups
Posse Foundation	Dallas Pride <i>Career Program Manager</i> dallasp@possefoundation.org	Attend career day event; Recruit students for summer internships
Harvard University	Benny Belvin <i>Associate Director of Career Services</i> bbelvin@fas.harvard.edu	Harvard Trek – Harvard University students had the opportunity to hear from WGBH employees about what they do at the Foundation and their career paths that led them there; ask questions and learn more about all of the different opportunities at WGBH; and take a tour of the facilities
The Base	Karla Aguilar kaquilar@thebase.org	Introduce local urban youth to careers in the media industry
Boston Chamber of Commerce: Young Professional Networking Event	Ali Nigro Program Manager anigro@bostonchamber.com	Networking and presentation from Mohamad Ali, President and CEO of Carbonite
National Association of Black Journalists (NABJ) Conference and Career Fair	Stacey Foxwell, Director, Content Administration – NPR sfoxwell@npr.org	Networking with other public media professionals throughout the country as well as recruiting journalists of color.
Get Konnected! The premier networking event for urban professionals	Colette Phillips, CEO of Colette Phillips Communications, Inc. info@cpcglobal.com	Participate in networking events

Appendix C – Training

Training Offerings

Completed and/or Ongoing:

Training CY 17-18	Description	Presenter(s)	Frequency
Management Roundtable	Leadership Development	Rich Brady, Beth Brettschneider & others	Bi-Monthly & ongoing
Benefits Orientation & New Hire Orientation	Overview of benefits plans and onboarding of new employees	HR Team members	Bi-Weekly & ongoing
Simmons Leadership Conferences	Women's leadership & professional development	Simmons College	Annual
The Partnership's Associates and Fellows Professional Development programs	Leadership Development for multicultural professionals	The Partnership, Inc.	Annual
Harvard ManageMentor Online Offerings	Self-paced elearning	Harvard Business Publishing	Ongoing
Lynda.com Online Offerings	Video self-paced elearning	Various instructors	Ongoing
Respectful Workplace Training for Supervisors	GBH Respectful Workplace Policy review & supervisor's role in managing behavioral issues at work	Donna Fernandes	2 sessions (Dec 11, 2017; Dec 13, 2017)
Respectful Workplace Training for non-supervisors	GBH Respectful Workplace Policy review & how to raise concerns	Donna Fernandes	Dec 21, 2017
Performance Management Training for Employees	WGBH performance process for writing self-evaluations and other reviewer feedback	HR Team Members	Annual
Performance Management Training for Supervisors	WGBH performance management process for writing and delivering effective performance	HR Team Members	Annual

	appraisals		
Performance Goal Setting	Setting SMART performance goals	HR Team Members	Annual
Talking to Children About Death	How to approach the difficult topic of talking to children about death.	Cigna (EAP Webinar)	July 12th. 2017
Manager’s Guide: Managing Employee Stress	Helping managers to coach their employees on dealing with stress.	Cigna (EAP Webinar)	July 19th, 2017
Introduction to Mindfulness: Enhancing Resilience, Focus, and Well-Being	Practical mindfulness tips and tools to use at work and in everyday life.	UMass Center for Mindfulness x WGBH	August 17th, 2017 September 12th, 2017
It’s My Budget, and I’m Sticking to It	Tips on budgeting, tracking expenses, and insights on how to make a budget work best.	Cigna (EAP Webinar)	September 6th, 2017
Suicide Awareness for Employees	Help employees gain a better understanding what could put someone at risk and the potential warning signs of suicide.	Cigna (EAP Webinar)	September 20th, 2017
Experiencing Mindfulness: Positive impacts	Practical mindfulness tips and tools to use at work and in everyday life.	Cigna (EAP Webinar)	October 4, 2017
Partner Violence Awareness	Learn what partner violence can look like. Find out how to talk to a friend in an abusive relationship. And ways to find help for self and others.	Cigna (EAP Webinar)	October 18th, 2017
Manager’s Guide: Talking to Employees about Sensitive Subjects	This webinar will discuss how to tackle sensitive issues directly, clearly, and with dignity.	Cigna (EAP Webinar)	On demand November 2017

Under Pressure: Managing Workplace Stress	A Cigna EAP onsite seminar that's part of WGBH's wellbeing programs intended to help employees achieve better work/life balance.	Cigna (EAP onsite)	November 14th, 2017
A Fresh Look at Healthy Eating	Teaching simple ways to get balance into meal choices and control portions; tips on changing unhealthy eating patterns; and key concepts that support weight loss.	Cigna (EAP Webinar)	November 15th, 2017
Holiday Stress: Putting Happy Back in the Holidays	Discover best practice on how to let go of unrealistic holiday expectations; balance obligations, deal with difficult family members, and overspending.	Cigna (EAP Webinar)	December 6th, 2017
Stress Relief: Train Your Brain	Training on how to rewire the stress response and practical techniques that can help.	Cigna (EAP onsite)	December 19th, 2017
Learn the Basics About Social Security & Maximize Social Security in Your Retirement Strategy	Training to help employees learn strategies and tips to help you manage their financial future with confidence. (Basic & Advanced)	Fidelity	December 12 th , 2017

Appendix D – Respectful Workplace Policy

WGBH Respectful Workplace Policy

1.0 Introduction

WGBH Educational Foundation (“WGBH”) is an equal opportunity employer. Our workforce is diverse, and we wish to foster that diversity in our workplace. Fostering diversity is consistent with our business and Foundation goals.

2.0 Objective

WGBH’s objective is to provide its employees a workplace that is free of harassment, intimidation or discrimination because of a person’s race, religion, color, sex/gender (in accordance with, among other laws, Title IX and applicable regulations), gender identity and gender expression, age, marital status, national origin, sexual orientation, citizenship, handicap or disability (in accordance with, among other laws, Section 504 of the Rehabilitation Act and applicable regulations), veteran or military status, political belief, pregnancy, genetic information or any other characteristic protected by law. **Harassment, intimidation or discrimination because of such characteristics is illegal, and WGBH will not tolerate such conduct.**

3.0 Our Policy

To promote a safe and discrimination-free workplace for all employees, WGBH has adopted this policy to describe:

- what conduct is prohibited and will not be tolerated;
- what an employee should do if subjected to harassment, intimidation or discrimination;
- what an employee should do if he or she observes harassment, intimidation or discrimination; and
- what will occur if this policy is violated.

WGBH has taken every effort to identify what conduct will not be tolerated. However, it is impossible to identify all conduct that is harassing, intimidating or discriminating. Employees should interpret this policy broadly.

This policy applies both in the workplace and in other settings in which you may find yourself in connection with your employment at WGBH. For example, the policy applies in our offices at all locations, at WGBH-sponsored events, at places where you travel in the course of your work with WGBH, and at gatherings for WGBH employees that take place outside the workplace.

This policy applies to all individuals who come into contact with WGBH. Harassment, intimidation, and discrimination will not be tolerated by any employee, contractor, guest or visitor, supplier, vendor, member, donor, sponsor, or client.

Finally, WGBH prohibits retaliation against any person who complains or reports conduct that violates or may violate this policy. Retaliation is illegal and will not be tolerated by WGBH. WGBH will not tolerate and specifically prohibits any retaliation against an individual who has:

- complained about harassment, intimidation, or discrimination;
- cooperated with an internal investigation of harassment, intimidation, or discrimination; or
- filed a complaint, testified, assisted or participated in any manner in an investigation, proceeding or hearing conducted by a state or federal agency.

WGBH takes allegations of harassment, intimidation, discrimination and retaliation seriously. WGBH will respond promptly to complaints of such conduct, and where it is determined that inappropriate conduct has occurred, we will act promptly to eliminate the conduct and impose such corrective action as is necessary, including disciplinary action, up to and including termination, where appropriate.

Please note that while this policy sets forth our goals of promoting a workplace that is free of harassment, intimidation, discrimination and retaliation, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable, regardless of whether that conduct satisfies the definition of harassment, intimidation, discrimination or retaliation.

4.0 Definition of Sexual Harassment

"Sexual harassment" means sexual advances, requests for sexual favors, and verbal or physical conduct of a sexual nature when:

- (a) submission to or rejection of such advances, requests or conduct is made either explicitly or implicitly a term or condition of employment or as a basis for employment decisions; or
- (b) such advances, requests or conduct have the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, humiliating or sexually offensive work environment.

Under these definitions, direct or implied requests by a supervisor for sexual favors in exchange for actual or promised job benefits such as favorable reviews, salary increases, promotions, increased benefits, or continued employment constitutes sexual harassment.

The legal definition of sexual harassment is broad and in addition to the above examples, other sexually oriented conduct, whether it is intended or not, that is unwelcome and has the effect of creating a workplace environment that is hostile, offensive, intimidating, or humiliating to male or female workers may also constitute sexual harassment.¹

While it is not possible to list all those additional circumstances that may constitute sexual harassment, the following are some examples of conduct which if unwelcome, may constitute sexual harassment depending upon the totality of the circumstances including the severity of the conduct and its pervasiveness:

- Unwelcome or unwanted sexual advances -- whether they involve physical touching or not;
- Offering employment benefits in exchange for sexual favors;
- Making or threatening reprisals after a negative response to sexual advances;
- Sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's sex life, comment on an individual's body, comment about an individual's sexual activity, deficiencies, or prowess;
- Sexual innuendos or insinuations;
- Verbal abuse of a sexual nature, graphic verbal commentaries about an individual's body, sexually degrading words used to describe an individual, suggestive or obscene e-mails, letters, notes or invitations;
- Displaying sexually suggestive objects, pictures, cartoons, web sites, e-mails, screensavers;
- Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive, derogatory or insulting comments;
- Physical conduct such as touching, assault, or impeding or blocking movements;

¹ As defined under Massachusetts, California and federal law. California law also describes harassment because of sex as including sexual harassment, gender harassment, and harassment based on pregnancy, childbirth or related medical conditions.

- Inquiries into one's sexual experiences; and
- Discussion of one's sexual activities.

All employees should take special note that, as stated above, retaliation is unlawful, and WGBH will not tolerate retaliation against an individual who has complained about sexual harassment or intimidation, who has cooperated with an investigation of a sexual harassment complaint, or who has filed a complaint, testified, assisted or participated in any manner in an investigation, proceeding or hearing conducted by a state or federal agency.

5.0 Harassment, Intimidation, or Discrimination on the Basis of Other Protected Characteristics

Conduct directed to an employee on the basis of another protected characteristic as identified in Section I that has the purpose or effect of unreasonably interfering with an the employee's work performance by creating an intimidating, hostile, humiliating or offensive work environment is considered harassment or intimidation and will not be tolerated by WGBH. Such conduct may include, but is not limited to:

- Pranks,
- Obscenities;
- Slurs;
- Threats;
- Racial, ethnic or other such jokes or remarks;
- Obscene gestures;
- Physical conduct, such as touching, assault, or impeding or blocking movements;
- Bullying;
- Negative innuendos and insinuations; and
- Comments or expressions of stereotyping

6.0 Complaints or Report of Harassment, Intimidation, and Discrimination on the Basis of a Protected Characteristic or Retaliation

If you believe that you have been subjected to harassment, intimidation, or discrimination because of a protected characteristic, or to retaliation, you have the right file a complaint with WGBH and are encouraged to complain about and report such conduct to WGBH. This may be done in writing or orally. WGBH requests that you complain or notify it of such conduct so that WGBH may intervene and put a stop to any such conduct.

If you would like to file a complaint, report conduct in violation of this policy, or discuss any concerns you may have, you may do so by contacting:

- Donna Fernandes, Managing Director for Organizational Effectiveness (617-300-3713)
- Fran Sullivan, VP of Human Resources (617-300-3731)

You can find information about this policy and the complaint process from Human Resources and/or EthicsPoint, our confidential whistleblower system. EthicsPoint can be found at www.ethicspoint.com or by calling 1-888-359-6297. EthicsPoint is an independent third-party organization that collects reports and forwards them to WGBH management for follow-up. Confidentiality of reporters to EthicsPoint is maintained and assured. WGBH's efforts to comply with nondiscrimination obligations are coordinated by Donna Fernandes.

If you observe or witness conduct that you believe may be harassment, intimidation, discrimination or retaliation, you should report such conduct pursuant to the complaint procedure outlined above. Your report will enable WGBH to investigate and put a stop to any such behavior.

Please be advised that this complaint and reporting procedure should be used with respect to conduct by employees, contractors, guests or visitors, suppliers, vendors, members, donors, sponsors, or clients.

7.0 Investigations into Harassment, Intimidation, Discrimination, and Retaliation & Your Confidentiality

When WGBH receives the complaint, we will promptly investigate the allegation in a fair and expeditious manner. The investigation will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances. Our investigation will include a private interview with the person filing the complaint and with any witnesses or others who may have pertinent information. We will also interview the person alleged to have committed the harassment or intimidation.

When we have completed our investigation, we will, to the extent appropriate, inform the person filing the complaint and the person alleged to have committed the conduct of the results of that investigation. If it is determined by WGBH that inappropriate conduct has occurred, we will act promptly to eliminate the offending conduct, and where it is deemed appropriate by the Foundation, we will also impose disciplinary action, up to and including termination of employment, as set forth below.

8.0 Disciplinary Actions

If it is determined that inappropriate conduct has been committed by one of our employees, we will take such action as is appropriate under the circumstances. Such action may include counseling, verbal warning, written warning, suspension or discharge from or termination of employment, and may include such other forms of disciplinary action as we deem appropriate under the circumstances.

Should it be determined inappropriate conduct has been committed by anyone other than an employee, such as but limited to contractor, guest or visitor, supplier, vendor, member, donor, sponsor, or client, WGBH will take such actions as it deems appropriate to remedy the situation.

9.0 State and Federal Remedies

In addition to the above, if you believe you have been subjected to harassment, intimidation or discrimination on the basis of a protected characteristic, or to retaliation, you may file a formal complaint with the government agencies set forth below. Using our complaint and reporting process does not prohibit you from filing a complaint with these agencies.

Below you will find information on local government agencies. If you work in a state not listed below, may consult your local state government website for local state contact information, and/or with the United States Equal Employment Opportunity Commission (EEOC) at www.eeoc.gov.

In Massachusetts:

In Massachusetts, you may file a complaint with the Equal Employment Opportunity Commission and/or the Massachusetts Commission Against Discrimination. You must file a complaint within 300 days of the allegedly discriminatory act. Contact information is as follows:

1. United States Equal Employment Opportunity Commission (EEOC)

John F. Kennedy Federal Building
475 Government Center
Boston, MA 02203

(800) 669-4000

2. Massachusetts Commission Against Discrimination (MCAD)

Boston Office: One Ashburton Place, Room 601
Boston, MA 02108
(617) 994-6000

Springfield Office: 436 Dwight Street, Room 220
Springfield, MA 01103
(413) 739-2145

In California:

In California, you may file a complaint with the California Department of Fair Employment and Housing within one year of the allegedly discriminatory act, and with the Equal Employment Opportunity Commission within 300 days of the allegedly discriminatory act. Contact information is as follows:

1. United States Equal Employment Opportunity Commission (EEOC)

Los Angeles Office: Roybal Federal Building
255 East Temple St., 4th Floor
Los Angeles, CA 90012
(800) 669-4000

Fresno Office: Robert E. Coyle Federal Courthouse
2500 Tulare Street, Suite 2601
Fresno, CA 93721
(800) 669-4000

San Diego Office: 555 West Beech Street, Suite 504
San Diego, CA 92101
(800) 669-4000

Oakland Office: 1301 Clay Street, Suite 1170-N
Oakland, CA 94612-5217
(800) 669-4000

San Francisco Office: 450 Golden Gate Avenue
5 West, P.O. Box 36025
San Francisco, CA 94102-3661
(800) 669-4000

San Jose Office: 96 North Third Street, Suite 250
San Jose, CA 95112
(800) 669-4000

2. California Department of Fair Employment and Housing

Bakersfield Office: 4800 Stockdale Highway, Suite 215
Bakersfield, CA 93309
(661) 395-2729
(800)884-1684

Fresno Office: 1320 East Shaw Avenue, Suite 150
Fresno, CA 93710
(559) 244-4760

(800) 884-1684

Los Angeles Office: 1055 West Seven Street, Suite 1400
Los Angeles, CA 90017
(213) 439-6799
(800) 884-1684

Oakland Office: 1515 Clay Street, Suite 701
Oakland, CA 94612
(510) 622-2941
(800) 884-1684

Sacramento Office: 2218 Kausen Drive, Suite 100
Elk Grove, CA 95758
(916) 478-7230
(800) 884-1684

San Diego Office: 1350 Front Street, Suite 1063
San Diego, CA 92101
(619) 645-2681
(800) 884-1684

San Francisco Office: 1515 Clay Street, Suite 701
Oakland, CA 94612
(510) 622-2973
(800) 884-1684

San Jose Office: 2570 North First Street, Suite 480
San Jose, CA 95131
(408) 325-0344
(800) 884-1684

Santa Ana Office: 2101 East 4th Street, Suite 255-B
Santa Ana, CA 92705
(714) 558-4266
(800) 884-1684