# Sample Monitoring Plan

*Note: This monitoring plan is not a statement of official policy of the institution. It represents an education tool and information directory to be used by the institution’s compliance risk management program. The official rules, regulations, and policies of the institution are published in the* [*Policies*](https://www.utoledo.edu/policies/) *and* [*Board of Trustees Bylaws*](https://www.utoledo.edu/offices/trustees/pdfs/miscellaneous/board-of-trustees-bylaws.pdf) *of the institution. This monitoring plan is intended to be a model for risk mitigation and may not be applicable to all situations.*

# **6.3 *Employee Relations Practices: Sexual Harassment***

**Summary**: Subjecting an employee to any of the several specified forms of behavior that are defined as sexual harassment is an unlawful act that can result in significant liability to UToledo.

**Legal Basis**: Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. Section 2000e et seq.

**Enforcement Mechanisms**: Internal complaints are addressed in sexual harassment complaint procedures. External complaints are enforced by regulatory agencies and federal and state courts,

**Specific Risk**: Noncompliance may result in internal employee complaints, external complaints filed with regulatory agencies, lawsuits with resultant payment of fines, damages, and costs, as well as the loss of qualified employees, and adverse media publicity.

**Risk Assessment**: High

**Applicable Institution Policy**:

**Responsible Individual**: EEO Officer or Human Resources Director

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| Specific Actions  (**Execution Control**) | Evidence of Actions  (**Evidence of Control**) | Review of Evidence  (**Supervisory Control**) | Proof of Review  (**Evidence of Control**) |
| Distribution of sexual harassment policy to all newly hired employees at New Employee Orientation (NEO).  Mandatory equal employment opportunity and sexual harassment training at NEO. | New employee signature on acknowledgment of receipt of sexual harassment training during NEO.  Training attendance sheets and agenda for NEO. | HR review of training attendance sheets and agenda to assure that newly hired employees scheduled to attend NEO attended and that the orientation included the required sexual harassment training. | HR reviewer’s initials and date on review of training attendance sheets and agenda for NEO. |
| Biennial onsite sexual harassment training for supervisors by the state commission on human rights. | Training attendance sheets indicating training attended by supervisory employees. | HR review of supervisory training attendance sheets to verify attendance of those scheduled to receive commission on human rights training. | HR reviewer’s initials and date of review of supervisory training attendance sheets.  HR report of all supervisors scheduled, but not in attendance at the biennial sexual harassment training. |
| Intake, assessment, and investigation of all employee complaints that might be deemed to be sexual harassment. | Investigation report for each sexual harassment complaint. | HR and/or EEO Office monitoring of sexual harassment complaints or preparation of formal report of findings concerning complaint. | HR documentation of the disposition of all complaints involving sexual harassment, the action taken, and the appropriate HR signature and date. |
| Periodic distribution of written sexual harassment policy with complaint procedures for sexual harassment and sexual misconduct to all employees. | Sexual harassment policy and signed acknowledgment form. | HR placement of acknowledgment form into employee personnel file. | HR report to compliance officer and supervisor of employees who have not completed sexual harassment training. |