# Office of Civil Rights

## Training for the Prevention of Sexual Harassment & Other Workplace Harassment (CA-Compliant Training)

*Education and Training not legal advice*

# Agenda

I. Program Objectives
II. EEO Protected Classes
III. Sexual Harassment
IV. Abusive Conduct
V. Scenarios
VI. Recap/Final Questions

# I. PROGRAM OBJECTIVES

# I. Program Objectives

- ✓ Comply with CA Training Requirements
- ✓ Review EEO Laws & Policies
- ✓ Clarify Supervisor Responsibilities
- ✓ Discuss Importance of Respect & Diversity in the Workplace

# I. Program Objectives
# CA Training Requirements

**2004**

- Training for the Prevention of Sexual Harassment (PSH) for Supervisors
- 50 > Employees
- Refresher every 2 years

**2014**

- Assembly Bill 2053 (aka "Bullying Act")
- Prevention of Abusive Conduct (AC)

**2018**

- Senate Bill (SB) 1343
- 5 > Employees, in year 2019 and completion by January 1, 2020
- PSH & AC Prevention for **ALL** employees, non-supervisory & supervisory
- Training w/in 6 mos. of hire/promotion, refresher every 2 years (year 2021)

**2019**

- SB 778 was assigned into law extended SB 1343 deadline to January 1, 2021

**2020**

- CA EEO statute of limitations extended to 3 years from date of last incident
- Race includes hair texture and protected hairstyles

# II. EEO PROTECED CLASSES

# II. EEO Protected Classes

| U.S. EEOC | CA DFEH |
|---|---|
| • Race<br>• Color<br>• Religion<br>• Sex (including Pregnancy, Gender Identity, Sexual Orientation)<br>• National Origin<br>• Age (40 yrs+)<br>• Disability (Physical or Mental)<br>• Genetic Information<br>• Citizenship Status | ***All the previous bases, plus below:***<br>• Ancestry<br>• Gender Identity<br>• Gender Expression<br>• Marital Status<br>• Medical Condition (HIV, Cancer)<br>• Military or Veteran Status<br>• Sexual Orientation<br>• Political Affiliation/Activities<br>• Protected Leaves* (FMLA, PDL, etc.) |
| • **Retaliation** | |

*Domestic Violence Status/Leave (non-EEO)

# II. District EEO Policy

**Statement of Policy:**

The San Francisco Bay Area Rapid Transit District (District) is committed to providing a work environment free from discrimination, harassment, and retaliation, including discrimination and harassment based on the EEO protected categories covered by this policy. The District is committed to providing equal employment opportunities to all employees and applicants for employment. This policy extends to conduct with a connection to an employee's work, even when the conduct takes place away from the District's premises, such as a business trip or business-related social function.

As an equal opportunity employer, we strive to have a workforce that is reflective of the community we serve and to provide a professional and respectful work environment. No person is unlawfully excluded from employment opportunities in any personnel transaction including recruitment, hiring, promotion, selection for training, termination, transfer, layoff, demotion, rates of pay or other forms of compensation, benefits and other terms and conditions of employment based on race (includes hair texture and protective hair styles), color, marital status, sexual orientation, religion (includes religious dress and grooming practices), national origin (including language use restrictions), ancestry, age (40 and above), sex/gender (includes pregnancy, childbirth, breastfeeding, and/or related medical conditions), gender identity/ gender expression, disability (mental and physical, including HIV and AIDS), medical condition (cancer or a record or history of cancer/genetic characteristics and information), request for family care leave, request for pregnancy disability leave, request for leave for an employee's own serious health condition, or military or veteran status, domestic violence victim status and any other status protected by state or federal law.

# II. District EEO Policy

District employees who meet state and federal eligibility requirements are:

- Guaranteed leave if disabled because of pregnancy;
- Guaranteed reasonable accommodation for pregnancy;
- Guaranteed leaves for the birth or adoption of a child, for the employee's own serious health condition, or to care for a "family member" (as defined by law) with a serious health condition;
- Protected from harassment because of their sex, race, or any other category covered under the law;
- Protected from retaliation for filing a complaint, for participating in the investigation of a complaint, or for protesting possible violation of the law; and/or
- Protected from prohibited harassment by coworkers, third parties, as well as supervisors and managers with whom the employee comes into contact.

The District is committed to providing reasonable accommodation to applicants and employees because of a disability or to practice or observe their religion, absent undue hardship. Employees with disabilities are also entitled to reasonable accommodation when necessary in order to perform the essential functions of the job.

# II. District EEO Policy

All BART employees are responsible for conducting themselves in accordance with the District's EEO Policy.

## Corrective Action Guidelines

The District will take appropriate corrective action(s) up to and including formal discipline against any employee(s) when an investigation has found that misconduct occurred. Such corrective action(s) may include, but are not limited to, letters of reprimand, suspension, demotion, or termination. Additionally, depending on the nature of the violation, civil liability could be imposed on the violator as well as the District.

## Reporting

All applicants and employees have the right to file complaints alleging a violation of the EEO Policy. The District complaint procedure does not require an employee to complain directly to their immediate supervisor. Any employee who believes that they have experienced EEO discrimination, harassment and/or retaliation is encouraged to file a complaint with the District's Office of Civil Rights within 30 days of the incident. Complaints of discrimination, harassment or retaliation should be directed to:

**Office of Civil Rights**
**2150 Webster Street, 4th Floor**
**Oakland, CA 94612**
**eeocomplaint@bart.gov**

# II. District EEO Policy

District policy and state law prohibit retaliation against an individual who files a charge or complains about EEO discrimination or harassment, who participates in an employment discrimination proceeding (such as an investigation or lawsuit), or who otherwise engages in protected activity including participation as a witness in an EEO investigation. Any such retaliation is strictly prohibited and is a violation of the District's Equal Employment Opportunity Policy, regardless of whether the original complaint is sustained.

All BART employees have the right to file their complaint with the Department of Fair Employment and Housing (DFEH), the Equal Employment Opportunity Commission (EEOC), or the U.S. Department of Transportation (DOT). The statute of limitations to file with DFEH is three (3) years from the date of the last discriminatory incident. The statute of limitations for the EEOC is 300 days from the date of the alleged harm. Complaints should be filed with DOT within 180 days of the alleged act of discrimination.

Robert M. Powers

Robert M. Powers
General Manager

13 April 2021

Date

# II. Prevention of Sexual Harassment in the Workplace

**Statement of Policy:**

The San Francisco Bay Area Rapid Transit District (District) is committed to maintaining a workplace that is free of sexual harassment. In keeping with the District's long-standing Equal Employment Opportunity (EEO) Policy, sexual harassment in the workplace will not be tolerated. The District is committed to enforcing this policy and to providing State of California mandated training to all of its employees to assist them in dealing sensitively and effectively with this important issue.

All BART employees are responsible for conducting themselves in accordance with the District's rules of employee conduct, including but not limited to, the EEO Policy.

Any employee who believes that they have been the victim of harassment on the basis of sex has the right to file a complaint with the District's Office of Civil Rights. All complaints of sexual harassment will be investigated. Retaliation against an employee for filing a complaint is prohibited by law. All parties involved will be treated in a fair and impartial manner. Employee privacy and confidentiality will be protected to the extent permitted by law.

Employees who violate this policy will be subject to disciplinary action, up to and including discharge.

# II. Prevention of Sexual Harassment in the Workplace

**Definition**

Sexual harassment is a form of sex discrimination and is an unlawful employment practice. It is a personal affront to the affected employee and negatively impacts morale, motivation, and job performance. This policy includes sexual harassment of District employees by non-employees. Unwelcome sexual advances, request for sexual favors, and verbal, physical, visual, or other conduct of a sexual nature constitutes sexual harassment and are prohibited by this policy when:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment;
- Submission to or rejection of such conduct by an individual is used as the basis for an employment decision; and/or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

# II. Prevention of Sexual Harassment in the Workplace

**Reporting**

Prompt and appropriate action should be taken to prevent or stop incidents of sexual harassment. Any employee who believes that they have been the target of sexual harassment is encouraged to inform the offending person verbally or in writing that such conduct is unwelcome, offensive, and must stop. An employee, however, is not required to communicate directly with the offending person, or if communication has been ineffective, the employee can complain directly to the Office of Civil Rights or any District manager, supervisor, foreworker or lead personnel. Failure to communicate with the perpetrator does not prevent an employee from filing a complaint, nor does it in any way exonerate the harasser.

Any manager, supervisor, foreworker or lead personnel who witnesses or has knowledge of sexual harassment or other forms of harassment or conduct prohibited by District rules must promptly report such conduct to and consult with the Office of Civil Rights. Managers, supervisors, foreworkers, and lead personnel have a legal responsibility to take action if they know or have reason to believe of a harassing situation. Managers, supervisors, foreworkers and lead personnel must take action to address the situation regardless of the victim's stated desire to pursue or not to pursue the matter.

# III. SEXUAL HARASSMENT

# II. Sexual Harassment
# Definition of Sexual Harassment

Sexual Harassment is any **unwelcome** sexual advance, request for sexual favors, and/or other verbal, visual, or physical conduct of a sexual nature <u>or</u> any conduct directed at an individual because of sex*

*Includes gender, gender identity, gender expression, sexual orientation, pregnancy and any medical condition related to pregnancy.

# II. Sexual Harassment, Cont. Definition of Sexual Harassment

- An individual's "**gender**" is one's assigned sex at birth.
- **Gender identity** is a person's internal understanding of and identification with gender.
- **Gender expression** is a person's gender-related appearance or behavior.
- **Transgender** is a person whose gender identity differs from the person's sex assigned at birth.
- **Sexual Orientation** refers to a person's romantic or sexual partner(s) of choice.

# II. Sexual Harassment, Cont.
# Types of Sexual Harassment

1. Quid Pro Quo
2. Hostile Work Environment
3. Bystander Harassment
   a) Quid Pro Quo Bystander Harassment
   b) Hostile Work Environment Bystander Harassment
4. Third Party Harassment

# II. Sexual Harassment, Cont. Forms of Harassment

| Verbal | Physical | Visual/Written |
|---|---|---|
| Jokes of a sexual in nature or based on stereotypes/sexist | Touching | Posters of naked women or men |
| Unwanted sexual advances or request | Hugging | Cartoons/drawings of a sexual nature |
| Derogatory sexual comments | Shoulder rubs | Photographs of depicting sex acts |
| Foul language | Blocking or impeding access | E-mails/Rumors of a sexual nature |
| Slurs or sexual innuendo | Sabotaging work | Sexual gestures |
| Pressure for dates | Imposing demeaning work tasks | Objects or paraphernalia |

# II. Sexual Harassment, Cont. Identifying Sexual Harassment

Using two standards:

- Reasonable Person Standard
- Victim's Response Standard

# II. Sexual Harassment, Cont. Identifying Sexual Harassment

## REASONABLE PERSON (RP) STANDARD

- Would a RP find the behavior/conduct objectionable or offensive?
- Severity judged from perspective of a RP
- Factors that can be considered: age, gender, race, position, etc.

# II. Sexual Harassment, Cont. Identifying Sexual Harassment

## VICTIM'S RESPONSE STANDARD

The perspective of victim rather than the harasser's intent is foremost in the court's consideration.

In effect, Perception v. Intent,
aka Impact v. Intent

# II. Sexual Harassment, Cont. Identifying Sexual Harassment

- ❑ What type? (Quid Pro Quo, Hostile Work Environment, Bystander, Third Party)
- ❑ What EEO basis? (Sex including GE, GI, etc.)
- ❑ What form? (physical, verbal or visual)
- ❑ Unwelcome?
- ❑ Severe or Pervasive?
- ❑ Would a RP consider the alleged conduct hostile, intimidating or offensive?

# III. Sexual Harassment, Cont. Potential Victims or Harassers

Victims (Complainants)

- ❑ Employee or Applicant
- ❑ Independent contractor (Consultant)
- ❑ Third party (indirectly affected employee)
- ❑ Any Gender (M/F/3rd Gender)

Harassers (Respondents)

- ❑ Manager/Supervisor/Foreworker/Lead
- ❑ Co-worker
- ❑ Non-employee (customer, vendor, sales rep)
- ❑ Any Gender (M/F/3rd Gender)

# III. Sexual Harassment, Cont. Possible Remedies and Cost

- Injunctive Relief
  - Training
  - Policy Changes
  - Punitive Damages
- Economic Damages
  - Lost Wages
  - Medical Expenses
  - Job Search Expenses
- Non-Economic Damages
  - Emotional Distress
  - Loss of production/efficiency
  - Damaged Reputation

Stop Inappropriate Conduct and an Apology

# III. Sexual Harassment, Cont. Liabilities

- The employer is **liable for failure to take necessary, reasonable steps** to prevent discrimination and harassment
- Supervisors and co-workers can also be held **personally liable** for harassment (CA)
- The employer's **liability can be reduced** if the employee "unreasonably failed" to take advantage of the employer's mechanisms to prevent and correct harassment

# IV. ABUSIVE CONDUCT

# IV. Abusive Conduct
# Definition of Abusive Conduct

**State of CA's Definition of Abusive Conduct:**

Conduct of an employer or employee in the workplace, with malice, that a reasonable person would find hostile, offensive and unrelated to an employer's legitimate business interests.

# IV. Abusive Conduct, Cont.
# Types of Abusive Conduct

- Verbal abuse
- Physical conduct that a **reasonable person** would find threatening, intimidating or humiliating
- Gratuitous sabotage or undermining of a person's work performance

# IV. Abusive Conduct, Cont. Examples of Abusive Conduct

- False accusations of mistakes or errors
- Yelling shouting or screaming
- Hostile glares or other intimating nonverbal behavior
- Exclusion or the silent treatment
- Use of insults or put downs
- Conduct intended to make someone fail
- Belittling a person opinions
- Constantly criticizing others
- Stealing credit for work done by someone else
- Starting false rumors about someone

# IV. Abusive Conduct, Cont. When is Abusive Conduct Illegal?

Answer: when conduct is based on EEO protected classes.

- "Bullying" in and of itself is not a violation of CA Law, **unless it can be shown to have been substantially motivated by an EEO protected characteristic.**

- Ralph Civil Rights Act claim: **hate violence or the threat of violence based on EEO protected classes**.

- Possible **non-EEO** claims:
  - Intentional infliction of emotional distress
  - Assault or battery

# IV. Abusive Conduct, Cont.
# EEO Protected Classes

| U.S. EEOC | CA DFEH |
|---|---|
| • Race<br>• Color<br>• Religion<br>• Sex (including Pregnancy, Gender Identity, Sexual Orientation)<br>• National Origin<br>• Age (40 yrs+)<br>• Disability (Physical or Mental)<br>• Genetic Information<br>• Citizenship Status | ***All the previous bases, plus below:***<br>• Ancestry<br>• Gender Identity<br>• Gender Expression<br>• Marital Status<br>• Medical Condition (HIV, Cancer)<br>• Military or Veteran Status<br>• Sexual Orientation<br>• Political Affiliation/Activities<br>• Protected Leaves* (FMLA, PDL, etc.) |
| • **Retaliation** | |

*Domestic Violence Status/Leave (non-EEO)

# IV. Abusive Conduct, Cont.

## District Operations, Rules & Proc.

- Rule 1203: no altercations, hostility, threats
- Rule 1301: respectful and courteous behavior
- Rule 1306: not engage in…horseplay, or any form of practical joking
- Rule 1307: no discrimination or harassment based on protected status
- Rule 1326: clear…understandable, civil in tone
- Rule 4403: shall not use obscene or profane language, false or deceptive communications

# IV. Abusive Conduct, Cont. Spectrum of Sexual Misconduct

# V. SCENARIOS
# 10 minutes

# Guiding Questions to Determine Workplace Harassment

- ❑What type(s)? (Quid Pro Quo, Hostile Work Environment, Bystander, Third Party)
- ❑What possible EEO basis? (Sex, Race, Age, Religion, etc.). (Did employee say? Do you have sufficient information?)
- ❑What form? (physical, verbal or visual)
- ❑Was it unwelcome? Severe or Pervasive?
- ❑Would a RP consider the alleged conduct hostile, intimidating or offensive?
- ❑Does the alleged conduct potentially violate District Code of Conduct? EEO Policies? CA/Federal Law?

# Example

Bob complains that Liam, a co-worker, "*keeps coming on*" to him. Bob alleges that Liam keeps sending repeated invitations by email to go to "*Happy Hour*" every payday Friday after work.

# Scenario #1

Clare and Juan work in the marketing dept. They are often paired up on special projects and spend a considerable amount of time together. Juan is attracted to Clare and has asked her out on several occasions, but never during work hours. Clare repeatedly rejects his offer, but Juan is a romantic and believes in courtship.

# Scenario #2

GRACE CRUNICAN LEADERSHIP ACADEMY

Rick, a vendor who replaces bottled water in the building, started bodybuilding in his spare time. The females on one floor began making complimentary comments about his body. At first, Rick was flattered. Then the comments became more sexually explicit.

# Scenario #3

GRACE CRUNICAN LEADERSHIP ACADEMY

You've heard an employee complain about back pain several days in a row now. This employee does not report to you. During one of those days, you heard him ask his supervisor if someone can help him lift some boxes. His supervisor tells him "Quit whining! You get paid a lot to lift a few boxes. Just get it done. Everyone else has stuff to do."

# Scenario #4

GRACE CRUNICAN LEADERSHIP ACADEMY

David, a new employee is struggling to learn office procedures. He calls his supervisor for help. His supervisor, Gwen says, “I have shown you how to use this equipment several times now. How’d you pass the test to get this job?” A week later, David approaches Gwen with the same question. Gwen says “Why can’t you learn this? Don’t they have these where you are from? A day later, David finds a potato in his locker. Passing him in the hallway, a co-worker teases him and says, “How’s Mrs. Potato Head?” Another says, “Have you had your Guinness today?”

# Scenario #5

GRACE CRUNICAN LEADERSHIP ACADEMY

You were invited to participate as a rater for a District a panel interview. During the deliberation, one of the panelists says, “I’m not sure if that candidate’s going to be a good fit with our staff.” The other raters says, “Yeah. He is overqualified for this position and seems a bit ‘old school’ to me.” The  adds, “To be honest, he reminds me too much of my grandfather!”

# Scenario #6

GRACE CRUNICAN LEADERSHIP ACADEMY

Jonah, a well-liked employee, has been changing his look and hairstyle for a year. He returns to work with a drastically changed appearance, and a new first name, Trina. The rumor mill starts once Trina tells her colleagues that she prefers the pronoun “she” instead of “he.” Staff now rarely acknowledge Trina’s presence or speak to her. Behind her back, when she’s mistakenly called by her former name, instead of taking correction, a co-worker Rosaria rolls her eyes. Foreworker Kwame says “Whatever” in response. One day in the cafeteria, an employee that Trina doesn’t know well asks, “So…are you a boy or a girl?”

# Scenario #7

GRACE CRUNICAN LEADERSHIP ACADEMY

Ryan, a mechanic, needs safety boots. On his day off, he went to a local safety shoe store and joked around with the female salesperson who has helped him in the past. He provided his Employee ID and last name to pay for the safety boots. As he was leaving the shoe store, he told the female salesperson, "*Hey, if you want some of this* (looked down on his lower body), *give me a call.*"

# Scenario #8

GRACE CRUNICAN LEADERSHIP ACADEMY

Supervisor Dawn has three direct reports, Foreworkers Liz, Tom and Jack.

In their monthly work group meetings, Dawn always requires Liz to set up the meeting in the conference room, provide coffee, and take notes.

# Scenario #9

GRACE CRUNICAN LEADERSHIP ACADEMY

You are a lead employee and trainer. A new BPD employee calls you. She said she wants to keep her concerns confidential at this time but asks you for advice on how she can change her shift or be paired up with someone else. You asked why and she tells you that she felt uncomfortable working with her current partner.

# Scenario #10

Mark is a 30-year-old male. His supervisor frequently touches his arm when talking to him and makes suggestive comments. Mark says he has never flirted with his supervisor and is feeling very uncomfortable about the attention he is getting. He has come to you for help.

# Scenario #11

Jane, a supervisor invites David, a newly hired temp, to go to a on a long weekend trip out of town. Not knowing how to say no, David tells Jane he doesn't like going away for the weekend when he has to work on Monday.  Jane tells David if he says yes, she can find a way for him to take Monday off with pay. She suggests over the weekend, they can discuss the possibility of making him a permanent employee.

# Scenario #12

The Toshiba Copy Machine Rep comes to the 4th floor to do maintenance on the copy machine. Each time he comes out, the Rep tells entertaining stories and jokes. Some employees can't wait for the copier to break down so they can hear the latest joke. No one has complained about the Reps humor.

# Scenario #13

Jerry has been working for the same company for over a decade. Within the last year Jerry started transitioning from male to female. Jerry made it known to her team that her pronouns are her / she. It has been almost a year and Mike, who started at the company with Jerry still refers to Jerry as a “he.” Mike does this quite often. Though he has been corrected numerous times by Jerry and his fellow employees, Mike is unapologetic, and justifies doing this because he claims to know Jerry as a “he” for such a long time. Mike complains about this whenever he is corrected.

# Scenario #14

Agnes is a 45-year-old who grew up in an Eastern European Country. Her manager calls everyone by an “identifying” nickname, including her. He does this because he thinks it makes everyone feel welcome. He coined the nickname “Babushka” for her, because of the brightly covered scarfs she wears on her head as part of her traditional dress in Eastern Europe.

# Scenario #15

GRACE CRUNICAN LEADERSHIP ACADEMY

Enzo walks into a panel interview for a promotional opportunity. One of the panel members says, “Oh.” Enzo recognized the panelist as someone who you were asked about during a confidential investigation about 2 years ago. Enzo finds out he did not get the promotion and tells you he was retaliated against.

# VI. RECAP/QUESTIONS?

# VI. RECAP
# HARASSMENT PREVENTION

## EMPLOYEE RESPONSIBILITIES:

- Complete required OCR trainings
- Comply with OR&P, including EEO policies
- Let harasser/employer know inappropriate, unwelcome conduct
- Report violations to a supervisor and/or OCR, and/or file externally with the FTA/DFEH/EEOC
- Cooperate with complaint investigations

# VI. RECAP
# HARASSMENT PREVENTION

SUPERVISOR RESPONSIBILITIES:

- Model appropriate, professional work behavior
- Ensure DFEH and EEOC poster(s) are in your work area
- Monitor workplace
- Consult with OCR when harassment concerns arise
- Uphold ORP, including EEO policies
- Respond to complaints

# VI. RECAP
# HARASSMENT PREVENTION

What are common complaint situations?

- You directly receive a complaint
- You directly observe harassing behavior
- You hear rumors
- An employee tells you something they heard/observed

# VI. RECAP
# HARASSMENT PREVENTION

What are you required to do as District supervisors?

- Respond immediately, tactfully and appropriately
- Document your actions
- Monitor your workplace

# VI. RECAP
# HARASSMENT PREVENTION

What are the next steps following direct observation of inappropriate behavior?

- Talk with Victim
- Talk with Harasser
- Take action / contact Labor Relations or OCR
- Document your actions
- Monitor workplace for retaliation

# VI. RECAP
# HARASSMENT PREVENTION

What are the next steps if you hear rumors:

- Take action to stop

  Clearly state to employees that all unprofessional, disrespectful behavior is to stop immediately. Cite OR&P.
- Seek advice: OCR, EAP and Labor Relations
- Document your actions
- Monitor workplace

# VI. RECAP
# HARASSMENT PREVENTION

What are the next steps if an employee comes to you with a complaint?

- Act quickly
- Avoid making judgment calls
- Maintain discretion; do not guarantee absolute confidentiality
- Keep affected employee(s) informed
- Seek advice from OCR and Labor Relations
- Arrange appropriate time and location for fact-finding interview

# VI. RECAP
# HARASSMENT PREVENTION

What you should **NOT** do if/when an employee comes to you with a concern

- Avoiding the problem/employee
- Not taking complaint seriously
- Failing to take appropriate and timely action
- Appearing insensitive to employee's rights
- Telling employee not to take concern to LKS or "Core BART"; promising that you will handle but do not follow through

# VI. RECAP
# HARASSMENT PREVENTION

## BEST PRACTICES

- Think before you speak
- Be alert
- Be aware
- Document
- Be consistent
- Be professional and respectful
- Know the law and policies

# VI. RECAP
# HARASSMENT PREVENTION

**RESOURCES**

**BART**

- Office of Civil Rights
- Labor Relations
- Employee Assistance Program Coordinator
- General Counsel

**WEBSITES**

- www.DFEH.ca.gov
- www.EEOC.gov
- www.FTA.gov
- www.workplacebullying.org

# VI. RECAP
# HARASSMENT PREVENTION

Workforce and Policy Compliance

eeocomplaint@bart.gov

THANK YOU.