



ADMINISTRATIVE PROCEDURE

SECTION Human Resources, County Administrative Office	PROCEDURE 200-A
TITLE Workplace Complaint Reporting Procedure	IMPLEMENTS POLICY 205, 301, 503
SPONSORING DEPARTMENT Human Resources, County Administrative Office	R&O N/A
ADOPTED September 10, 2026	REVIEWED N/A REVISED N/A

OBJECTIVE

This Procedure establishes uniform guidelines for reporting workplace complaints in Washington County. It provides employees, elected officials, contractors, volunteers, and members of the public with clear guidance on how to report concerns related to improper governmental conduct, workplace discrimination, harassment, sexual assault, retaliation, and workplace violence. This Procedure promotes prompt reporting, ensures complaints are properly documented and routed, and supports a safe and respectful workplace.

AUTHORITY

The authority to issue or revise this Procedure is reserved to the County Administrator in coordination with the Chief Human Resources Officer. The County Administrator may authorize exceptions to this Procedure when deemed appropriate.

APPLICABILITY

This Procedure applies to workplace complaints made under the following Administrative Policies:

- Policy 205 Reporting of Improper Governmental Conduct
- Policy 301 Workplace Discrimination, Harassment, Sexual Assault, and Retaliation Prevention
- Policy 503 Workplace Violence Prevention

This Procedure may also be used to investigate conduct that constitutes a potential violation of the Washington County Personnel Rules and Regulations Article 5 (Prohibited Conduct,

Discipline and Appeals), when Human Resources or the County Administrative Office determines that a formal investigation is warranted.

Timing and Employment Status

This Procedure applies to alleged conduct arising out of or relating to the subject's County employment. Neither the passage of time since the alleged conduct occurred nor a change in the employment status of the complainant or subject, for any reason, including separation from County employment, by itself removes a complaint from the scope of this Procedure. Such complaints will be addressed consistent with applicable law and policy.

Nothing in this section limits the evidence that may be considered in an investigation. Where relevant, and consistent with applicable law and policy, prior or related conduct may be considered in assessing an allegation, even if that conduct is not itself the subject of the complaint.

Applicability To Specific Offices and Officials

Washington County Sheriff's Office

- The Washington County Sheriff's Office (WCSO) maintains an Internal Affairs Unit (IAU) responsible for investigations covered by WCSO policies.
- Complaints of workplace conduct against the elected Sheriff shall be handled in accordance with the Complaints/Investigations Involving Elected Officials Procedure.

District Attorney's Office

- Complaints involving the prosecutorial function of the elected District Attorney (DA) and their subordinates are outside the scope of this procedure.
- Complaints of workplace conduct involving DA Office staff are subject to this Procedure.
- Complaints of workplace conduct against the elected District Attorney (other than prosecutorial function) shall be handled in accordance with the Complaints/Investigations Involving Elected Officials Procedure.

Justice Court

- Complaints alleging judicial misconduct by the elected Justice of the Peace are subject to the jurisdiction of the Oregon Commission on Judicial Fitness and Disability.
- Complaints involving the judicial, court, or hearings officer functions of the Justice of the Peace and their staff are outside the scope of this procedure.
- Complaints of workplace conduct involving Justice Court staff, other than those involving judicial/court/hearings officer functions cited above, are subject to this Procedure.

- Complaints of workplace conduct against the elected Justice of the Peace (other than judicial misconduct) shall be handled in accordance with the Complaints/Investigations Involving Elected Officials Procedure.

County Auditor

- Complaints concerning the exercise of the elected County Auditor's independent audit authority (e.g., audit scope, findings, recommendations, methodology, work plan, or selection of programs/services to be audited), or their staff acting under that authority, are outside the scope of this Procedure.
- Complaints of workplace conduct involving Auditor's Office staff, other than those under the County Auditor's independent audit authority cited above, are subject to this Procedure.
- Complaints of workplace conduct against the elected County Auditor shall be handled in accordance with the Complaints/Investigations Involving Elected Officials Procedure.
- Apart from the audit-authority matters described above, the County Auditor's involvement in complaints concerning the conduct of those subject to this procedure is limited to reports of improper governmental conduct as defined in Policy 205.
- Nothing in this Procedure limits the County Auditor's authority under Policy 205, Section 2.1.6, to refer reports of improper governmental conduct to an outside public agency, including law enforcement or the Oregon Government Ethics Commission, without prior approval.

Board of County Commissioners

- Complaints of workplace conduct against an individual member of the Board of County Commissioners shall be handled in accordance with the Complaints/Investigations Involving Elected Officials Procedure.
- Matters concerning the legislative or policy decisions of the Board acting as a body are outside the scope of this Procedure.
- Nothing in this provision limits the County Auditor's authority under Policy 205, Sections 1.4.5 and 2.1.6, with respect to reports of improper governmental conduct involving the Board or its members.

Office of the County Administrator

- Complaints of workplace conduct involving County Administrative Office staff are subject to this Procedure.

- Complaints of workplace conduct against the County Administrator are subject to this Procedure; however, because the County Administrator sits at the top of the County's administrative reporting structure, in the instance of a complaint of workplace conduct against the County Administrator, the Board of County Commissioners (or its designee) shall serve as the Appointing Authority and exercise the oversight functions otherwise assigned to the County Administrator under this Procedure and the Workplace Investigation Procedure.
- These procedures apply unless otherwise defined in the County Administrator's employment contract. Nothing in these procedures is intended to limit enforcement of any provision in the County Administrator's employment contract.

Office of County Counsel

- Complaints of workplace conduct involving Office of County Counsel staff are subject to this Procedure.
- Complaints against the County Counsel are subject to this Procedure; however, because the Office of County Counsel ordinarily provides the legal review and advice relied upon throughout the complaint and investigation process, in the instance of a complaint against the County Counsel, the Board of County Commissioners (or its designee) shall serve as the Appointing Authority, and independent legal counsel shall be retained for the review and advisory functions otherwise assigned to County Counsel.
- These provisions apply unless otherwise defined in the County Counsel's employment contract. Nothing in these procedures is intended to limit enforcement of any provision in the County Counsel's employment contract.

PROCEDURE

1. How to report a complaint

1.1. Reporting channels

Any employee or individual who believes unlawful conduct or a County policy violation has occurred may report the concern through any of the following channels:

- 1.1.1 Direct Report to Management: Verbally or in writing to a supervisor, manager, or department head.
- 1.1.2 Human Resources: Contact your assigned Human Resources Business Partner, the Employee and Labor Relations Team, or email at hremployeerelations@washingtoncountyor.gov.
- 1.1.3 County Administrative Office: Contact the County Administrator or Assistant County Administrator.
- 1.1.4 Office of County Counsel: Contact County Counsel or the Senior Assistant County Counsel assigned to Human Resources.

- 1.1.5 Complaint Intake Form: Available from Human Resources or online; may be submitted in person, by mail, or electronically.
- 1.1.6 Ethics Matters Hotline: Available 24/7 online or by phone. This is the only channel that is set up for anonymous reporting.
- 1.1.7 County Auditor's Office: Complaints regarding improper governmental conduct may be reported to the County Auditor. If the County Auditor receives a complaint that does not involve improper governmental conduct, the complaint will be referred to Human Resources for intake and handling under this Procedure.
- 1.2 Information to Include in a Complaint to the extent known:
 - Name and contact information of the complainant (unless submitting anonymously)
 - Name(s) of the person(s) or entity involved in the alleged conduct
 - Description of what happened, including specific dates, times, and locations
 - Names of any witnesses
 - Any supporting documentation or evidence
 - Description of how the conduct has affected the complainant
 - The complainant's desired outcome

1.3 Anonymous Complaints

The County will accept and review complaints submitted anonymously through any reporting channel. However, complainants should be aware of the following:

- The Ethics Matters Hotline is the only reporting channel that is set up for anonymous complaints. Other channels (email, written reports, verbal reports) reveal the complainant's identity.
- The County's ability to conduct a thorough investigation may be limited when the complainant's identity is unknown. If additional information is needed in order to allow the complaint to proceed and the complainant is non-responsive after three inquiries or six weeks (whichever comes last), then the complaint will be closed.
- Anonymous complainants are encouraged to provide as much detail as possible.
- Anonymous complainants using the Ethics Matters Hotline should check back through the Hotline system periodically for follow-up questions from investigators.

2. Supervisor and Manager Obligations

Supervisors and managers who receive a complaint or observe conduct that may violate Policies 205, 301, or 503 must:

- Immediately report the matter to Human Resources, regardless of whether the affected employee has requested that a complaint be filed.
- Not attempt to investigate the matter independently unless specifically authorized by Human Resources.
- Maintain confidentiality to the extent possible.
- Not retaliate against any person who reports a concern or participates in an investigation.

Failure to report may result in disciplinary action.

3. Complaint Intake and Routing

3.1. Logging the Complaint

Upon receipt of a complaint, the receiving party will ensure the complaint is logged into the Complaint Management System within three (3) business days. The log entry will include:

- Date and time the complaint was received
- Method of receipt (in person, phone, email, Hotline, etc.)
- Complainant information (if known)
- Subject(s) of the complaint
- Summary of allegations
- Policies potentially implicated (205, 301, and/or 503)

3.2. Notification

Upon logging a complaint, the receiving party will notify:

- The Chief Human Resources Officer or Deputy CHRO
- The Employee and Labor Relations Manager

If any of these individuals are party to the complaint (e.g., complainant, subject, or witness), the ACA with oversight for HR shall be notified in their place.

3.3 Complaints Received via Ethics Matters Hotline will be:

- Reviewed by the Advisory Committee within five (5) business days of receipt
- Classified and routed for follow-up as defined in Procedure 205-A
- Timeline requirements under the Workplace Investigation Procedure begin when a complaint is referred by the Advisory Committee to the ELR Manager (or designee/Delegated Authority) for follow-up

3.4 Routing to the Workplace Investigation Procedure

Once a complaint is logged and initial notifications are made, the complaint will be processed in accordance with the Workplace Investigation Procedure, which governs initial assessment, interim measures, investigation, findings, reporting, and follow-up. Timeline requirements under the Workplace Investigation Procedure begin when the

complaint is referred to the ELR Manager (or designee/Delegated Authority) for follow up.

4. Confidentiality

All complaints are treated as confidential to the extent practical. The County will limit disclosure of complaint information to those with a legitimate need to know. Complaint records may be subject to disclosure under Oregon Public Records Law, or other applicable law, unless an exemption applies

DEFINITIONS

1. **Advisory Committee:** The committee responsible for reviewing complaints received through the Ethics Matters Hotline and routing them for follow-up. Composed of an Assistant County Administrator, Chief Human Resources Officer, Chief Financial Officer, Controller, Director of the Office of Access and Opportunity, and County Counsel, or designee of any of the foregoing.
2. **Anonymous:** A report or complaint made without the reporter providing their identity, so that the reporter's identity is not known to the County. Because an anonymous reporter cannot be contacted, the County's ability to seek follow-up information or provide updates may be limited.
3. **Chief Human Resources Officer (CHRO):** The Director of the Department of Human Resources.
4. **Complainant:** The person(s) lodging a complaint against another person(s) or entity.
5. **Complaint Management System:** The County's electronic system used to log, track, and manage workplace complaints and investigations.
6. **Confidential:** Information that is known to the County but disclosed only to those with a legitimate need to know or as required by law. Confidentiality differs from anonymity; for example, a person's identity may be known to the County and still be kept confidential.
7. **Designated Authority:** A non-culpable person above the ELR Manager who, in instances when the ELR Manager is party to a complaint (e.g., complainant, subject, or witness), is designated to act as the ELR Manager for purposes of this procedure and will serve as the primary point person for processing of the complaint.
8. **Elected Official:** A person holding an elected office, whether elected by popular vote or appointed, office in Washington County, including members of the Board of County Commissioners, the Sheriff, the District Attorney, the County Auditor, and the Justice of the Peace.
9. **Employee and Labor Relations (ELR) Team:** The division of the Department of Human Resources responsible for providing employee relations services and conducting workplace investigations under this procedure.
10. **Ethics Matters Hotline:** The County's 24/7 confidential reporting system, available online and by phone, administered through a third-party provider.
11. **Senior HR Business Partner (HRBP):** A Senior Human Resources Analyst assigned to the Employee and Labor Relations Division.

12. **Improper Governmental Conduct:** Conduct or actions of County employees, officials, contractors, or agents that constitute waste, fraud, or abuse as defined in Policy 205.
13. **Office of Access and Opportunity (OAO):** The County department responsible for monitoring County compliance with Equal Opportunity and Civil Rights statutes.
14. **Subject:** The person(s) or entity against whom a complaint is filed.

QUESTIONS

For questions regarding this Procedure, contact the Chief Human Resources Officer or the Employee and Labor Relations Manager (or designee).

PERIODIC REVIEW

This Procedure will be reviewed by the Human Resources Department and the County Administrative Office at least every three (3) years, or more often as needed, and updated as necessary.