



# ADMINISTRATIVE PROCEDURE

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| <b>SECTION</b><br>Human Resources, County Administrative Office               | <b>PROCEDURE</b><br>200-B                 |
| <b>TITLE</b><br>Workplace Investigation Procedure                             | <b>IMPLEMENTS POLICY</b><br>205, 301, 503 |
| <b>SPONSORING DEPARTMENT</b><br>Human Resources, County Administrative Office | <b>R&amp;O</b><br>N/A                     |
| <b>ADOPTED</b><br>September 10, 2026                                          | <b>REVIEWED</b> N/A<br><b>REVISED</b> N/A |

## OBJECTIVE

This Procedure establishes uniform guidelines for conducting administrative investigations in Washington County that result from workplace complaints. It establishes the roles, obligations, and expectations of all parties involved in the investigation process, ensures compliance with applicable federal and state laws, and promotes consistency, fairness, and timeliness in all workplace investigations.

## 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 investigations conducted 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 an investigation from the scope of this Procedure. Such investigations 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.

#### Department-Specific Applicability Provisions

##### 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.
- Investigations involving the elected Sheriff are subject to the Complaints/Investigations Involving Elected Officials Procedure.

##### District Attorney's Office

- Complaints involving the prosecutorial function of the District Attorney (DA) and their subordinates are outside the scope of this procedure.
- Investigations of workplace conduct complaints involving DA Office staff are subject to this procedure.
- Investigations involving 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.
- Investigations of workplace conduct complaints involving Justice Court staff, other than those involving judicial/court/hearings officer functions cited above, are subject to this procedure.
- Investigations 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 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.
- Investigations of workplace conduct complaints involving Auditor's Office staff, other than those under the County Auditor's independent audit authority cited above, are subject to this Procedure.
- Investigations involving 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 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 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 provisions 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. Initial Assessment**

#### **1.1. Assignment**

Upon referral of a complaint to the ELR Manager (see Sections 3.3 and 3.4 of the Workplace Complaint Reporting Procedure), the Employee and Labor Relations (ELR) Manager will assign an Investigator within five (5) business days. If the complaint involves the ELR Manager, the next level of Appointing Authority above the ELR Manager who is not involved in the complaint (i.e., the Designated Authority) will take responsibility for this step.

If the subject of the complaint is an elected official, notification will be provided as soon as practicable to the County Administrator and County Counsel.

The Auditor may act outside this procedure if acting under Policy 205, Section 2.1.6.

#### **1.2. Initial Assessment**

The Investigator will conduct an initial assessment to determine:

- Whether any of the allegations in the complaint, if true, would constitute unlawful conduct or a violation of County policy.
- Which laws, policy or policies are implicated (e.g., 205, 301, 503, or multiple).
- Whether an investigation is warranted.
- Whether interim protective measures are needed.

The Investigator will notify the appropriate department head or designee (if not a subject of the complaint) during the initial assessment process that a complaint has been received, and may consult with the department head (or designee) at the Investigator's discretion unless a violation of Policy 301 is alleged (i.e., discrimination, harassment, sexual assault, or retaliation). The notification will include a reminder that retaliation against complainants, witnesses, or other participants is prohibited under federal and state law and County policy. When an appointed department head cannot impartially exercise that role — for example, because the department head is a subject of the matter, has a conflict of interest, or is a material witness — the Appointing Authority responsibilities for the investigation pass to the next non-conflicted authority in the chain of command (typically the Assistant County Administrator or County Administrator).

The Investigator will also consult with County Counsel and Risk Manager if any question of potential unlawful conduct is involved, and with the Risk Manager if interim protective measures are being considered.

#### **1.3. Possible Outcomes of Initial Assessment**

The Investigator will consult with the ELR Manager (or with the Designated Authority if needed) about the results of the initial assessment before determining further action. The ELR Manager (or Designated Authority) will consult with County Counsel at their discretion. The initial assessment will result in at least one of the following determinations:

#### 1.3.1 Investigation Warranted

If the initial assessment determines that complaint (if true) would constitute a policy violation or unlawful conduct, an investigation will proceed in accordance with Sections 4-8 of this procedure.

#### 1.3.2 Investigation Not Warranted

If the allegations would not constitute policy violations or unlawful conduct, no further action is warranted. In this case, the Investigator will document the rationale for why no further investigation is warranted, provide affected parties with notification pursuant to Section 7 (Communication of Findings), and advise the affected parties of other available resources if appropriate.

#### 1.3.3 Supervisory Counseling/Coaching

If the conduct does not rise to the level of a policy violation, the Investigator may recommend supervisory counseling, coaching, mediation or other conflict resolution services, or additional training. The department will be responsible for follow-through.

#### 1.4. Referrals to External Agencies

If the initial assessment determines that the alleged conduct warrants a referral to an external agency, the Investigator will consult with County Counsel regarding:

- Referral to law enforcement of suspected criminal activity.
- Referral to the Oregon Governmental Ethics Commission for potential violations of ORS Chapter 244 (Government Ethics).

The Investigator, in consultation with the ELR Manager (or Designated Authority) and County Counsel, may elect to suspend the administrative investigation pending an external agency's review.

#### 1.5. Initial Notifications

Upon determination that an investigation is warranted, the Investigator shall provide initial notification to the following parties:

- Department Head or Designee: Notification as described in Section 1.2 that an investigation has been initiated involving their department (unless the department head is a subject of the complaint).
- Appointing Authority: Notification that an investigation has been initiated (unless the Appointing Authority is a subject of the complaint).
- Complainant: Written acknowledgment that the complaint has been received and an investigation has been initiated, including the name of the assigned Investigator and contact information.
- Subject: Written notification that a complaint has been filed and an investigation has been initiated, including the name of the assigned Investigator.

### 2. Complaints Involving Multiple Policies

For complaints that involve multiple policies, the Investigator will:

- Address all allegations in a single, comprehensive investigation when feasible.
- Consult with County Counsel to determine if parallel investigations are necessary.
- Coordinate with the Office of Access and Opportunity (OAO) when civil rights issues raised by members of the public are involved.

- Document the analysis of each alleged policy violation separately in the investigation report.

### 3. Interim Protective Measures

Interim protective measures may be implemented at any point to protect people and property, preserve evidence, prevent new or additional violations, and ensure workplace safety. Measures may include:

- Placing employees on administrative leave with pay
- Temporary reassignment or modified work schedule
- Physical separation of parties
- No-contact directives during working hours
- Enhanced security measures
- Preservation of electronic evidence

The County Administrator or designee, in consultation with department head (or designee), HR, and County Counsel, is authorized to implement interim measures.

Administrative leave is not disciplinary. When determining whether to place an employee on leave, the following factors should be considered:

- Severity of the allegation
- Potential for workplace disruption
- Safety concerns for any party
- Risk of evidence tampering or witness intimidation
- Ability to conduct a thorough and objective investigation with the employee present

### 4. Conducting the Investigation

#### 4.1. Investigation Principles

All investigations must be:

- Prompt: Investigation is initiated within ten (10) business days of assignment and completed within forty-five (45) business days (unless extended with ELR Manager or Designated Authority approval as defined in Section 10).
- Impartial: Investigation is conducted by an unbiased investigator.
- Thorough: All relevant evidence is gathered, and all appropriate witnesses are interviewed.
- Fair: All parties are given a meaningful opportunity to be heard.
- Documented: All steps, evidence, and findings are properly recorded.
- Completed: An investigation may be completed even if the subject or complainant leaves the organization during the course of the investigation.

#### 4.2. Selecting the Investigator

The ELR Manager (or designee or Designated Authority) is responsible for assigning the Investigator. Investigations will typically be assigned to a Senior Human Relations Business Partner (SHRBP), County Investigator, or external investigator. The Investigator must be unbiased, not subordinate to any party in the complaint, competent to conduct investigations, and available to complete the investigation in a timely manner. An assistant investigator may be assigned to assist the Investigator as appropriate.

#### 4.3. Criteria for External Investigator

An independent, third-party investigator may be considered when:

- The complaint involves senior management or department heads.
- The complaint is highly complex or requires specific technical expertise.
- Internal investigators have conflicts of interest.
- The matter represents significant legal exposure or potential for public scrutiny.
- An impartial investigation cannot be conducted internally.
- Internal investigators have insufficient capacity to complete the investigation in a timely manner due to staffing or workload constraints.
- As directed by the County Administrative Office

Under these circumstances, the ELR Manager (or Designated Authority) will consult with the Chief HR Officer, the County Administrative Office and Office of County Counsel before assigning an Investigator. The external investigator will be managed by the ELR Manager, County Counsel, and/or CAO to ensure that it is someone up the chain of command from the subject and someone not named in the complaint. External investigators shall provide only findings of fact; any conclusions regarding policy violations shall be determined by the ELR Manager (or designee or Designated Authority) and County Counsel.

Note that this section does not apply to investigations involving elected officials (see the Complaints/Investigations Involving Elected Officials Procedure instead). Note also that any complaints against the County Administrative Office, County Counsel, or the Human Resources Department will be referred to an external investigator.

### 5. Interviews

#### 5.1. Recording of Interviews

All interviews will be audio or video recorded. The investigator will state the date, time, and location; have parties identify themselves; inform the interviewee of the recording; and obtain verbal consent.

If an interviewee refuses to be recorded, the investigator will document the refusal in writing and proceed with detailed written notes. The refusal will be noted in the investigation report.

#### 5.2. Right to Representation

- Union-Represented Employees (Weingarten Rights): Employees subject to a collective bargaining agreement (CBA) have the right to request that a union representative be present during interviews that may result in discipline. Witnesses and complainants may be entitled to union representation when the interview evolves such that the witness or complainant may be subject to discipline. In such case the interview will be stopped and reconvened with a union representative. Employees must affirmatively request representation. Any request must be made in writing to the investigator at least 72 hours prior to the scheduled interview.
- Non-Represented Employees: Non-represented employees who are subjects of an investigation may request a support person. The support person may not be a witness in the same investigation or an attorney. Attorneys are not allowed to

be present during routine personnel interviews unless otherwise required by law.

#### 5.3. Garrity Warnings

In consultation with County Counsel, the Investigator will determine whether Garrity warnings will be given. If potential criminal conduct is discovered during an interview, the interview must be suspended the interview immediately to allow for consultation with County Counsel.

#### 5.4. Confidentiality

At the start of each interview, the investigator will provide a verbal notice advising the interviewee of confidentiality guidelines.

#### 5.5. Employee Obligation to Cooperate

All employees are required to cooperate fully in workplace investigations and provide truthful information. Failure to cooperate or providing false information may result in disciplinary action, up to and including termination. Employees are also asked to maintain confidentiality about the investigation in order to protect the integrity of the investigation and the privacy of those involved.

### 6. Investigation Findings and Report

#### 6.1. Standard of Proof

The standard of proof for all investigative findings is preponderance of the evidence, which means the events or facts in question are more likely than not to have occurred based on the weight of all credible evidence.

#### 6.2. Findings

- Substantiated: The preponderance of evidence supports that the alleged conduct occurred.
- Unsubstantiated: The preponderance of evidence supports that the alleged conduct did not occur.
- Insufficient Evidence: The evidence was insufficient to determine whether the alleged conduct occurred or not.

#### 6.3. Investigation Report

The Investigator will draft a final report that includes: allegations; steps taken; witnesses interviewed and when; findings of fact; policies implicated; and summary of evidence supporting findings of fact. The report will not include recommendations for discipline. Before finalized, the report will be reviewed by County Counsel, who will ensure it is legally sufficient, and by the ELR Manager (or Designated Authority). Investigations may be returned to the Investigator for further action as necessary. The investigator provides findings of fact only; the ELR Manager (or Designated Authority) and County Counsel determine whether policy violations occurred.

### 7. Communication of Findings

Investigation reports are to be treated with the utmost confidentiality. However, certain parties will receive notification as follows:

#### 7.1. Notification to Department

The Investigator will provide a Summary to the department head (or designee) that includes the allegations, summary of evidence, and findings within fifteen (15) business days of the report's completion. The Investigator will schedule a meeting to discuss the

findings department head (or designee) within ten (10) business days of submitting the Summary. The meeting may include discussion of discipline to be considered and imposed.

#### 7.2. Notification to Complainant

The complainant will receive a written Closeout Memo advising them that the investigation has been closed and, if appropriate, whether the allegations were substantiated, unsubstantiated or there was insufficient evidence. The complainant will be advised whether corrective action was taken but is not entitled to know whether or what disciplinary action was taken. The Investigator will provide a Closeout Memo to the complainant within 15 business days of the report's completion.

#### 7.3. Notification to Subject

The subject will be notified whether allegations were substantiated or not. If any allegations are substantiated, subject will be disciplined in accordance with Personnel Rules and Regulations and any applicable CBA.

#### 7.4. Notification to Witnesses

Witnesses will be notified at the start of their interview that they will receive a notice once the investigation is complete. No further details will be shared.

#### 7.5. Distribution of Full Report

The full report will be distributed by the ELR Manager (or Designated Authority) to the CHRO, County Counsel, and Risk Manager unless one of the foregoing is a witness, subject or complainant. Reports shall be retained in the Human Resources Department. The CHRO will notify the appropriate ACA when findings are substantiated and will share a copy of the Summary document.

#### 7.6. Distribution of Report for Complaints involving Improper Governmental Conduct

For complaints about improper governmental conduct of waste, fraud, or abuse under Policy 205, the following additional reporting requirements apply:

- The County Administrator will provide a statistical summary of the final report to the County Auditor as defined in Section 3.14 of Procedure 205-A.
- For a report of allegations and findings that involve the County Administrator, a copy will be shared with the Board of County Commissioners as defined in Section 2.4 of Policy 205.
- For a report with substantiated findings involving employees, elected officials, or contractors of the County, a copy of the specific report findings will be distributed to the Board of County Commissioners as defined in Section 2.4 of Policy 205.

### 8. Relationship to Disciplinary Process

Investigation findings and conclusions are not appealable.

Employees subject to discipline may appeal in accordance with Article 5.4 of the Washington County Personnel Rules and Regulations or the applicable Collective Bargaining Agreement.

### 9. Follow-Up

- 9.1. For substantiated complaints of harassment, the Appointing Authority or designee will contact the complainant once every 3 months through the calendar year following the date the complaint was received (for example, if the complaint was received in November, quarterly follow-ups must occur for 14 months through the following December).

- 9.2. For all other substantiated complaint types, follow-up by the Appointing Authority or designee will occur twice, once within 30 days and again within 90 days.
- 9.3. Follow-up by the Appointing Authority or designee should include an inquiry about whether the conduct resulting in a policy or PPR violation has stopped and whether retaliation has occurred.
- 9.4. A complainant may opt out of this follow-up either verbally or in writing.

#### 10. Investigation Timeline

- 10.1. Investigator assigned: Within five (5) business days of referral of complaint to the ELR Manager (or designee/Designated Authority)
- 10.2. Complaint acknowledged: Within five (5) business days of assignment
- 10.3. Investigation initiated (first interview scheduled, evidence collection begun, or an external investigator assigned): Within ten (10) business days of assignment
- 10.4. Investigation completed (including ELR and County Counsel review): Within forty-five (45) business days of complaint referral to the ELR Manager (or designee/Designated Authority)
- 10.5. Summary to department head (or designee) and Closeout Memo to complainant: Within fifteen (15) business days of investigation completion
- 10.6. Findings meeting with department head or designee: Within ten (10) business days of Summary submission

Extension of any step in the Investigation Timeline may be granted by the ELR Manager or designee upon written request but should generally not exceed an additional twenty (20) business days per extension request. If the subject or any witnesses are on protected leave, an extension may be granted by the ELR Manager (or designee or Designated Authority) without the required written request.

#### 11. Status Communications

##### 11.1. Regular Updates Required

The Investigator or designee shall provide status updates to the below-mentioned parties at least every twenty (20) business days from the date the investigation is initiated until the investigation is closed. Status communications shall be provided in writing via email or memorandum to:

- The complainant
- The subject of the complaint
- The Department Head or designee (unless the department head is the subject, in which case communications shall be provided to the Assistant County Administrator)

##### 11.2. Content of Status Communications

Status communications (unless circumstances requires otherwise) shall include:

- Confirmation that the investigation remains active
- General status update (e.g., "interviews are ongoing," "evidence review in progress," "report drafting underway")
- Anticipated next steps or timeline, if known
- Contact information for questions

Status communications shall NOT include:

- Specific details of allegations, witness statements, or evidence

- Preliminary findings or conclusions
- Information that could compromise the integrity of the investigation
- Confidential information about other parties or the investigation

#### 11.3. Opt-Out

The complainant and/or subject may opt out of regular status updates at any time by providing written notice to the Investigator. An opt-out applies only to routine status updates; parties will still receive required notifications such as interview scheduling, findings communications, and closeout memos.

#### 11.4. Timeline Extensions

When the ELR Manager (or designee or Designated Authority) grants a timeline extension pursuant to Section 10, the Investigator shall notify all affected parties (subject, complainant, and Department Head or designee) of the extension. Such notification satisfies the status communication requirement for that status update period.

#### 11.5. Documentation

All status communications shall be documented in the investigation file, including the date, method of communication, recipient, and general content. Any opt-out requests shall be documented in writing and retained in the investigation file.

### 12. Confidentiality

The County treats investigations as confidential to the fullest extent of the law. Investigators, reviewers, and other County employees handling investigation materials in an official capacity are required to maintain the confidentiality of those materials in accordance with applicable law and policy. Other participants — including complainants, subjects, and witnesses — are asked to maintain confidentiality about the investigation. Investigation reports, and supporting materials, may be subject to disclosure under Oregon Public Records Law unless an exemption applies.

### 13. Documentation and Record Retention

All documentation will be maintained in the Complaint Management System and secure HR files. Records will be retained in accordance with Oregon record retention laws.

### 14. Quarterly Review of Investigations

A review committee will convene quarterly to review all investigations completed in the previous quarter to identify trends or systemic issues and recommend process improvements. Committee members will be designated by the County Administrator and will include the assistant county administrator(s), Human Resources leadership, and County Counsel representative(s).

## DEFINITIONS

1. **Administrative Leave with Pay:** Placing an employee on paid leave status in accordance with Article 6.4 of the Personnel Rules and Regulations.
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. **Appointing Authority:** The Personnel Rules and Regulations define the Appointing Authority as the Department Head (elected or appointed) or designated manager with the authority of Appointment for any County Position within their Department.
4. **Business Day:** For purposes of this Procedure, a Business Day means Monday through Friday, excluding Saturdays, Sundays, and any holiday on which Washington County administrative offices are closed. This definition applies regardless of the work schedule of any individual department or work unit involved in a matter.
5. **Chief Human Resources Officer (CHRO):** The Director of the Department of Human Resources.
6. **Complainant:** The person(s) who lodged a complaint against another person(s) or entity.
7. **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.
8. **Credible Evidence:** Information that a reasonable person would find believable and trustworthy based on its source, consistency, and reliability.
9. **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 the investigation.
10. **Due Process:** The rights an employee has when facing possible discipline, including an unbiased investigation, notice of charges, and opportunity to respond.
11. **Employee and Labor Relations (ELR) Team:** The division of the Department of Human Resources responsible for conducting workplace investigations.
12. **Garrity Warning:** A notification to public employees that they are required to answer investigatory questions as a condition of employment, but that their compelled statements cannot be used against them in criminal proceedings (*Garrity v. New Jersey*, 385 U.S. 493 (1967)).
13. **Senior Human Resources Business Partner (SHRBP):** A Senior Human Resources Analyst assigned to the Employee and Labor Relations Division who may serve as Lead Investigator.
14. **Investigator:** The person assigned to conduct the investigation, responsible for gathering evidence, conducting interviews, and preparing the investigation report. One or more Investigators may be assigned to a single investigation as needed.
15. **Preponderance of the Evidence:** The standard of proof requiring that the evidence shows it is more likely than not that the alleged conduct occurred.
16. **Subject:** The person(s) or entity against whom the complaint is filed.
17. **Support Person:** An individual present solely to provide emotional support during an interview. May not answer questions or participate.
18. **Union Representative:** A union steward or representative for employees covered by a collective bargaining agreement.
19. **Witness:** A person who may have directly observed an incident or has firsthand knowledge of facts being investigated.

## QUESTIONS

Contact the Chief Human Resources Officer or ELR Manager.

**PERIODIC REVIEW**

The policy and associated guidelines will be reviewed at least every 3 years by [Policy Owner/Department] to ensure accuracy, relevance, and compliance with County, state, and federal requirements.