



County Policy of Equity

County of Los Angeles



Policy of Equity: Background

Highlights of County's Longstanding Equity Complaint Process

1994	2000	2011	2017
County Code § 5.019.010 (c) Sexual Harassment Prohibition and Reporting Process	Board instructed departments to comply with discrimination complaint process (former OAAC)	Board approved CPOE	Board approved CPOE

Policy of Equity

- Unanimously adopted by the Board in 2011
- Replaced existing County equity policies



Policy of Equity: **Scope of Coverage**

- Workplace conduct
- Workplace conduct must be connected to protected characteristics under State and Federal Law
- Retaliation is strictly prohibited



Policy of Equity: Protected Characteristics

- Age
- Ancestry
- Color
- Ethnicity
- Religious Creed
- Denial of Family and Medical Care Leave
- Disability
- Marital Status
- Medical Condition
- Genetic information
- Military and Veteran Status
- National Origin
- Race
- Sex & Gender
- Gender Identity
- Gender Expression
- Sexual Orientation



Policy of Equity: **Proactive Features**

- Independent review by legal experts
- 'Checks and Balances system'
- Inappropriate Conduct Toward Others (ICTO) Standard
- Duties of Supervisors and Managers to Report
 - (County was ahead of California State Law)
- No barriers to reporting



Policy of Equity: **Protections & Benefits**

- Enables positive culture change/corrects behavior
- Promotes equity and inclusion
- Preserves workplace dignity and professionalism
- Provides forum to air complaints
- Applies uniform standard to all (even contractors)
- Allows for early intervention
- Satisfies legal requirements



Policy of Equity: **Workplace Awareness**

- Regular policy dissemination/acknowledgment (*annually*)
- Regular mandatory training (*every 2 years*)
 - **Specialized training for supervisors and managers on reporting obligations**
- Intranet site (online filing portal/informational resources)



Policy of Equity: **Complaint Reporting**

- No barriers to reporting
- Complaints can be filed at any time
- Managers and supervisors are *required* to report (regardless of chain of command)
- Every complaint undergoes thorough assessment
- Comprehensive case management system



Policy of Equity: Reporting Methods

- Online (County intranet)
- Telephone (hotline)
- Fax
- E-mail
- Mail
- In-person



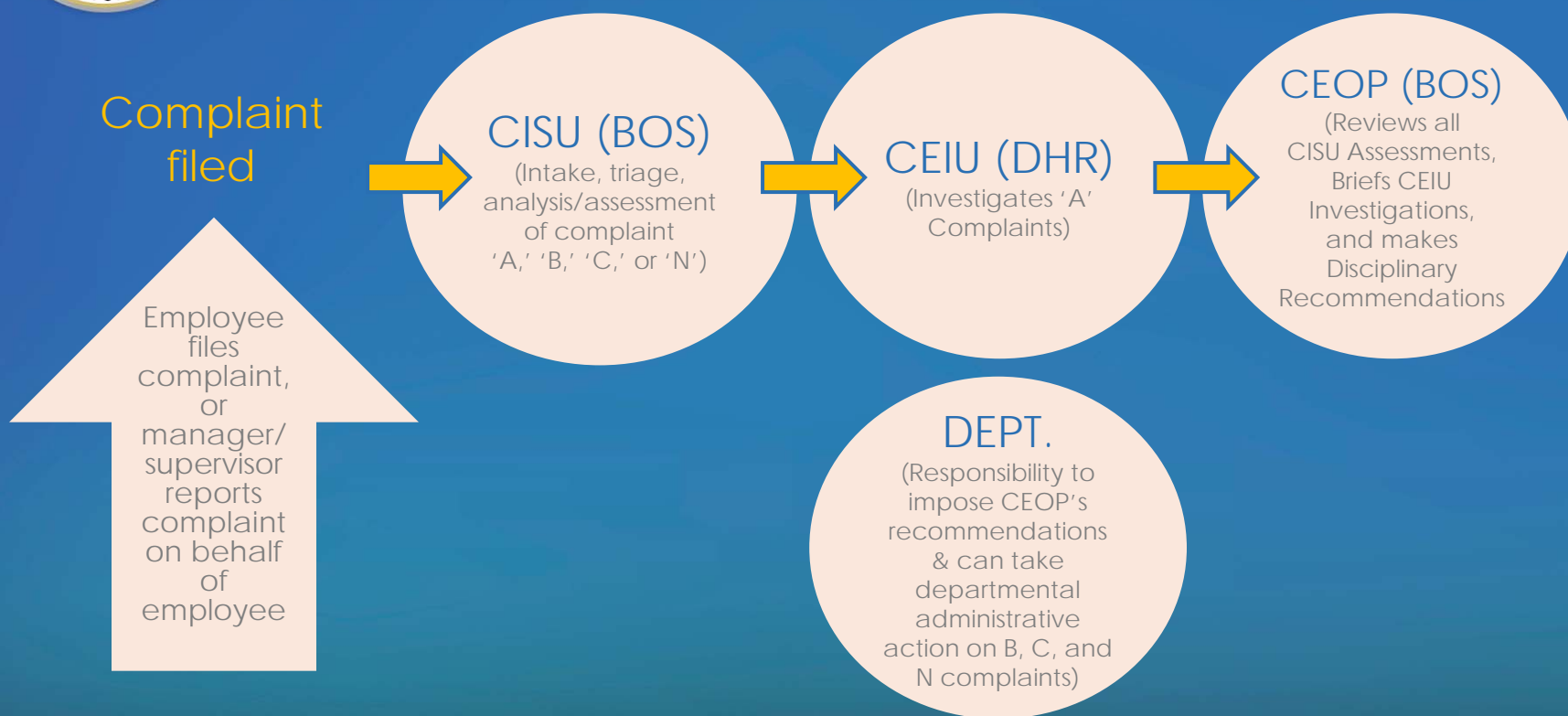
Policy of Equity: Checks and Balances System

County Equity Oversight Panel Independent review by legal experts

BOS	DHR
<ul style="list-style-type: none">• Complaint Intake• Complaint Assessment	<ul style="list-style-type: none">• Complaint Investigation (<i>Potential policy violations</i>)• Mediation Services



Policy of Equity: Complaint & Investigations Process



Employees Retain ALL Grievance and Appeal Rights following a Disciplinary Recommendation from the CPOE.



Policy of Equity: Meets DFEH & EEOC Best Practices

DFEH & EEOC	Policy of Equity Process	
1. Policy support at highest organizational levels	Board of Supervisors & Department Heads	✓
2. Widely known reporting system that accepts all equity complaints	County intranet, hotline, in-person, mail, e-mail (articulated in Policy, marketing, and training materials)	✓
3. Lower threshold to prevent illegal conduct	ICTO	✓
4. Prohibition against retaliation	Policy of Equity explicitly prohibits retaliation	✓
5. Confidentiality of information	Policy of Equity states that all complaint information is to be kept confidential	✓
6. Communication back to complaint parties on outcomes	Department responsibility to keep parties updated	✓



Policy of Equity: Meets DFEH & EEOC Best Practices

DFEH & EEOC	Policy of Equity Process	
7. Regularly communicated Policy and training	Regular distribution of Policy and mandatory training	✓
8. Discipline for Policy violations	CEOP briefing recommendations/departmental implementation of discipline	✓
9. Supervisor and manager accountability	Policy of Equity explicitly requires mandatory reporting and workplace monitoring	✓
10. Well-trained, objective, and neutral investigators	All investigative staff are highly qualified and trained	✓



Policy of Equity: Recommendations

- Additional permanent staff and resources to accommodate potential integration of quasi-County entities
- Enhanced marketing campaign
- Augmented technology resources (including online filing)
- Evaluate County contractor processes as it relates to the Policy of Equity
- Ensure compliance with regular mandatory training