



**WHATCOM COUNTY
ADMINISTRATIVE SERVICES – HUMAN RESOURCES**

Review of Harassment and Complaint Policies and Procedures

October 6, 2025

Updated June 17, 2026

Although formal complaints are infrequent, HR acknowledges the significant impact to those involved. HR has been working for over a year to make improvements and is committed to prioritize this work through implementation of the Matrix Consultant recommendations not yet addressed while also balancing the other needs of our employees and departments.

OPERATIONAL

Matrix Recommendation	Priority	HR Action	Date Completed
Centralize complaint processing and investigations under HR	High	Updated Prohibiting Harassment policy clarifies HR will investigate	9/17/25
Implement standardized methodology	High	All HR staff attended Conducting Personnel Investigations training from Summit Law. From that training created: <ul style="list-style-type: none"> • Investigation checklist • Fact finding template • Notice to Witness template • Notice to subject template • Final report template • Close out to complainant template 	HR Training – 4/16/25 Template Documents – 7/31/25
Implement clear timelines associated with the complaint handling process and enhance communication	High	Updated Prohibiting Harassment policy clarifies we promptly respond to all complaints and supervisors are responsible for taking immediate and appropriate corrective action. The policy also requires complainants to be informed of an investigation outcome. In situations where behavior has had a broader impact on a team, the County may communicate to	9/17/25

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		the affected group that the matter has been addressed, without disclosing confidential details, to restore trust, reinforce expectations, or maintain a respectful workplace.	
Provide additional training to HR staff on utilizing trauma-informed approaches	Medium	<p>Reviewing training materials on implementing trauma-informed investigation and will continue to expand our awareness on this approach.</p> <p><u>HR staff have received education on what it means to bring a more trauma informed approach to our investigation process. We have also met with other County staff with more expertise in trauma informed care to learn from them. As a result, we are taking a more personal approach to the entire investigation process including:</u></p> <ul style="list-style-type: none"> • <u>Showing appreciation for a complainant's courage for bringing a concern forward and helping them feel heard;</u> • <u>Being transparent with them about what they can expect throughout the investigation and when they can expect to hear from us next;</u> • <u>Following up with every investigation closure in person or at least over the phone to discuss complaint outcomes and next steps;</u> • <u>Communicating especially sensitively regarding those complaints that aren't substantiated for any illegal activity or policy violations but that are valid concerns nevertheless; and</u> • <u>Providing all resources and support available.</u> <p><u>We will continue to explore more ways to enhance our knowledge and improve our practices.</u></p>	Goal: 12/31/25 <u>Completed</u>
Utilize a digital case management system for processing all complaints	Medium	Created a tracking system using Excel.	7/31/25
Implement key performance metrics (KPIs) related to the handling of complaints	Medium	<p>Track and watch for trends. Area of complaint, department, substantiated/unsubstantiated, time from notice of complaint to close out, and outcome.</p> <p>Working on developing a confidential anonymous survey to send to complainants to receive feedback on fairness, timing, communication, and confidentiality. Once created, will send survey to all complainants from Jan. 2025 on.</p>	7/31/25 Survey Goal: 11/15/25

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		<u>Developed survey and began sending to all complainants in 2026.</u>	<u>April 2026</u>
Develop quarterly and annual reports on performance metrics related to the complaints process	Low	Anticipate reporting on performance metrics to the Executive and the Risk Management Working Group <u>Metrics report is planned for the upcoming Risk Management Work Group meeting on June 25, 2026</u>	In progress <u>June 25, 2026</u>
Develop standard operating procedures (SOPs) surrounding all aspects of the complaint handling process.	High	All HR staff attended Conducting Personnel Investigations training from Summit Law. From that training created: <ul style="list-style-type: none"> • Investigation checklist • Fact finding template • Notice to Witness template • Notice to subject template • Final report template • Close out to complainant template 	HR Training – 4/16/25 Template Documents – 7/31/25
Maintain current staffing levels allocated to processing complaints and performing investigations. Continue to provide cross training on this subject to ensure two HR FTEs are equipped to handle investigations.	High	Cross-training underway. Currently have three HR FTEs equipped to handle investigations. <u>Five HR FTEs are fully trained, experienced, and able to handle investigations.</u>	6/30/25 <u>3/31/26</u>
Continue to house investigations into workplace issues under HR.	Medium	No change needed.	N/A

POLICY & PROCEDURE

Matrix Recommendation	Priority	HR Action	Date Completed
Each elected office formally adopting and applying county-wide harassment and discrimination policies to ensure consistency across all departments, employees, and officials.	High	The Executive's Office will work with HR and the PAs office or outside counsel to develop a process to document agreements to adopt (or to note a decision to not adopt by any separated elected office) <u>Worked with Civil PA to draft MOU. MOU adopted by Council on June 9, 2026. Drafting modified MOUs to take to the other elected officials.</u>	Under review <u>In progress with other elected officials</u>
Integrate harassment and discrimination policies into broader administrative initiatives with clearly assigned responsibilities for training, resource management, and incident handling.	Medium	Updated personnel policies and provided all employee training to highlight the changes.	9/17/25
Clearly define prohibited behaviors including harassment, discrimination, bullying, retaliation, and bias within the policy to eliminate ambiguity.	High	Updated Prohibiting Harassment policy with clear definitions for unlawful behavior. Updated Standards of Conduct policy to address other behavior expectations.	9/17/25
Ensure policies are widely accessible by posting them on the intranet, in employee handbooks, newsletters, in physical spaces, onboarding packets, and public-facing websites.	High	HR created 20-minute NEOGOV Learn course highlighting changes to policies and provided as required training to all staff. Policies were provided in multiple formats for accessibility. Email sent from Executive Sidhu to County leaders, including elected, explaining need for required training and leadership role to ensure completion with request for elected to inform Deputy Executives if opting out. <u>Policies are posted in our employee handbook, on the intranet, and provided in every new hire onboarding orientation.</u>	9/17/25
Establish consistent reporting channels and ensure all staff who can receive complaints are fully trained to process a complaint.	High	Updated policies create clarity on reporting channels, HR Staff completed investigations training in April 2025. In 2026, HR will explore additional training as funding allows through the <u>National Public Employer Labor Relations Association</u> (NPELRA) who offers an 8-hour investigations course for public sector employers.	4/16/25 Explore additional training in 2026
Provide regular reminders to employees and elected officials about the policy, reporting procedures, and available resources.	High	This is possible through NEOGOV Learn and is incorporated into our annual workplan. <u>County wide required training on revised policies was provided through a NEOGOV custom course in October</u>	In progress <u>Completed for 2025</u>

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		<u>2025. 917 employees completed the training. Refresher training will be provided in October 2026.</u>	
Establish a formal process to review and update policies annually, incorporating legal updates and evolving best practices.	High	Formal process exists for <u>policy development and management.</u>	N/A – already in place

WORKFORCE TRAINING & DEVELOPMENT

Matrix Recommendation	Priority	HR Action	Date Completed
Continue with the implementation of NeoGov Learn. Utilize this system to track training completion rates for employees. Continue to expand training opportunities as needed.	High	HR worked on implementation May – August 2025 and the new system is live and working well.	8/15/25 Tracking completion and expanding opportunities - ongoing
Adjust onboarding training to include courses specific to administrative policies and procedures related to handling and reporting workplace concerns.	High	All new hires are asked to review the Prohibiting Harassment policy and acknowledge their receipt and understanding as well as review the employee handbook and other means to report and resolve complaints.	In place since we implemented NEOGOV Onboard in 2023. The updated policies are now provided to all new hires.
Consider alternative formats for training (i.e., in-person events) that occur on a set basis.	Medium	Under review as funding allows. Working with departments to track in-person department sponsored training. <u>All staff and leadership communication and conflict resolution trainings are scheduled for July 22nd as in-person events with Allen and Unger Consulting.</u>	Under review <u>7/22/26</u>
Require training on respectful workplace topics (as well as procedures for handling workplace concerns) to be provided to all staff regularly – ideally every two years or less.	High	Bystander Intervention required training provided to all staff. Additional training to be offered through NEOGOV Learn.	9/17/25 Tracking completion == ongoing <u>1,027 employees have completed</u>
Implement required training for all new and existing supervisors that must be complete. For new supervisors, this	High	Curriculum developed for new supervisors with current content provided covering:	8/15/25 Expansion/Refinement == ongoing

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<p>training should be provided within three months of appointment. Provide refresher courses on this training regularly or in response to updates to policies or procedures.</p>		<ul style="list-style-type: none"> • Welcome letter from HR with resources (attached) • Respectful Workplace training • Preventing Sexual Harassment training • Building a Kind and Connected Workplace • Performance Management • <u>Acknowledgement of Prohibiting Harassment policy and their responsibility as supervisor to report concerns</u> • <u>Welcome to Leadership (custom course) Sets out required training for new supervisors along with support systems they can rely on from HR staff and our EAP. 59 leaders have completed so far.</u> • <u>Leadership Academies (custom course) two academy levels provided with ongoing learning/professional development opportunities</u> 	<p><u>6/11/26 – email sent to all leaders introducing new courses</u></p>
<p>Broaden the scope and content of training offerings, particularly in the areas of reporting complaints and conflict management. Consider implementing new training on topics Countywide.</p>	<p>Medium</p>	<p>Multiple courses offered through NEOGOV Learn. Expansion on new training topics ongoing. <u>All staff and leadership communication and conflict resolution trainings are scheduled for July 22nd as in-person events with Allen and Unger Consulting.</u></p>	<p>8/15/25 <u>7/22/26</u></p>
<p>Implement a means of capturing feedback from participants related to the quality of current training offerings and develop a method of proactively identifying new training needs.</p>	<p>Low</p>	<p>In place through NEOGOV Learn. Participants receive a link to a survey upon completion of a course to evaluate quality of training and provide other training topics of interest.</p>	<p>8/15/25 *see below feedback on Personnel Policies Update course</p>