LOS ANGELES POLICE COMMISSION

REVIEW OF LOS ANGELES POLICE DEPARTMENT POLICIES THAT IMPACT SWORN WOMEN PERSONNEL

Conducted by the

OFFICE OF THE INSPECTOR GENERAL

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EXECUTIVE SUMMARY

At the direction of the Los Angeles Board of Police Commissioners (BOPC), the Office of the Inspector General (OIG) conducted a comprehensive review of the Los Angeles Police Department's (LAPD or Department) policies and practices affecting sworn women personnel. The review assessed whether LAPD policies align with national best practices and compared them with those of three major law enforcement agencies: the Chicago Police Department (CPD), Los Angeles County Sheriff's Department (LASD), and the New York Police Department (NYPD).

The OIG's evaluation focused on policies addressing discrimination, harassment, retaliation, pregnancy, parental leave, and lactation accommodations in the workplace. The review included a comparative policy assessment across agencies, a survey of LAPD sworn personnel, and a review of internal complaint investigations.

Key Findings

- **Policy Strengths**: LAPD has implemented several progressive policies, including 12 weeks of paid parental leave, anti-discrimination guidelines, and allowing its pregnant employees to wear maternity uniforms.

- **Survey Insights**:

    - Of the 494 sworn personnel who responded (6% of the workforce), 64% reported overall job satisfaction. Women reported slightly higher satisfaction than men.
    - Gender disparities emerged in perceptions of workplace fairness and support. For example, 35% of women strongly disagreed that the Department conducts thorough investigations into harassment or discrimination, compared with 18% of men.
    - More than 50% of both men and women believed promotions were not based on merit.
    - 30% of sworn personnel reported having a mentor, and over half indicated that mentorship is lacking within the Department.

- **Complaint Investigation Review**:

    - The OIG reviewed a statistically valid sample of 29 internal complaint investigations from 2024 involving allegations of discrimination, harassment, and/or retaliation.
    - In 27 cases, the Department conducted thorough investigations and reached appropriate outcomes. In the remaining two, the OIG found issues with investigative completeness or adjudication, though none were significant enough to alter the final outcomes.

- Three employees received formal discipline, while three received corrective action.

Recommendations

To strengthen its policies and practices, the OIG recommends that the Department:

1. Centralize all workplace-related policies and directives into one clearly labeled, easily accessible location on the Department's intranet. Ensure that updates are regularly maintained and easily searchable.

2. Instead of biennial workplace equity trainings, implement mandatory annual workplace equity training for both supervisory and non-supervisory employees.

3. Develop workplace bystander harassment training and require mandatory training for all employees regardless of rank.

4. Evaluate the pregnancy disclosure policy (Department Manual 3/762.93) to consider allowing voluntary disclosure of one's pregnancy within a reasonable time until mandatory disclosure. Additionally, eliminate the requirement for pregnant employees to submit a written statement from their physician unless a workplace accommodation or modification to working conditions is requested or necessary. This aligns with CPD and NYPD practices and provide greater privacy for employees.

5. Pilot an internal conflict resolution or mediation program to address ongoing workplace issues between involved parties, particularly in unresolved cases. The Department should report back to the BOPC within one year of implementation with an assessment of the program's effectiveness and measurable outcomes. As part of this pilot program, the Department shall provide quarterly updates to the OIG with identifiable trends and types of complaints mediated.

6. Develop and implement a mentorship program that pairs junior officers with experienced mentors, with a primary focus on the professional needs and career aspirations of participating officers rather than organizational management priorities. This approach ensures the program remains relevant, practical, and responsive to the challenges officers face in their day-to-day roles and long-term career planning.

   The mentorship program should be structured yet flexible, allowing mentor-mentee pairs to tailor discussions and development goals around key areas such as career development, skill development, leadership preparation, and navigating Department culture. Emphasis should be placed on building trust, encouraging open dialogue, and fostering a supportive environment for professional growth.
   Additionally, the mentorship program should include training on strategic leadership, conflict resolution, and organizational navigation. This could address the widespread

perception that mentorship development is lacking and improve career development and retention.

I. BACKGROUND

The Department appointed its first female police officer in September 1910. According to the Department's most recent data, women make up 19% of the workforce, representing 1,642 of the Department's 8,683 sworn officers.[1] This figure is approximately seven percentage points higher than the national average of 12% for sworn women personnel in law enforcement.[2]

The National Policing Institute reports that women in law enforcement receive fewer complaints, use force less often, draw their firearms less often, and are generally viewed by communities as more honest and compassionate.[3] These findings underscore the valuable contributions women make to the profession and highlight the importance of increasing their representation across all levels of policing – international, federal, state, and local.

In response to the persistent underrepresentation of women in sworn roles, agencies nationwide have committed to the 30x30 Pledge. This initiative outlines a set of practical, low, or no-cost steps agencies can take to boost both the presence and experience of women in sworn roles.[4] The goal is to ensure that by the year 2030, at least 30% of all police officers are women. The Department is one of hundreds across the nation that have taken this pledge, demonstrating a commitment to advancing gender equity within the profession.

As part of ongoing efforts to evaluate and improve diversity in policing, the OIG conducted a comparative review of the LAPD's policies alongside the policies of three other major law enforcement agencies: the CPD, LASD, and NYPD.[5] This review aimed to assess both policy alignment and the current state of female representation within these agencies.

Although women make up about 19% of sworn personnel within the LAPD, this figure lags the CPD, where women make up 25% of the sworn workforce. Table No. 1 compares the percentage of sworn women personnel across the four agencies. This comparative approach helps find areas for improvement and informs strategies to support the goals of the 30x30 Pledge.

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[1] The LAPD personnel numbers were sourced from the LAPD deployment roster as of August 24, 2025. As of June 17, 2026, there are 1,614 officers who identify as, "Female," or "Nonbinary," out of 8,550 sworn personnel, totaling 18.8%.

[2] According to an online publication by the National Policing Institute, *March: Women in Policing*, 2024 (March: Women in Policing - National Policing Institute).

[3] March: Women in Policing - National Policing Institute

[4] https://30x30initiative.org/

[5] The OIG selected the included agencies based on their size or proximately to Los Angeles and at the direction of the Board of Police Commissioners.

Table No. 1 Percentage of Sworn Women Personnel

Agency	State	Agency Size (approx.)	% Sworn Women Personnel
Chicago Police Department	Illinois	15,000 sworn	25%
New York Police Department	New York	33,000 sworn	21%
Los Angeles Police Department	**California**	**9,000 sworn**	**19%**
Los Angeles County Sheriff's Department	California	10,000 sworn	18%

II. INTRODUCTION

Law enforcement personnel operate under a framework of policies and procedures designed to uphold the law and protect public safety. These policies also set clear expectations in the workplace. However, some policies may affect women differently than men—potentially creating barriers that hinder career advancement, diminish workplace satisfaction, and impact overall well-being. When policies fall short, the consequences are real and far-reaching that affect all employees.

The OIG reviewed key policy areas that may result in disparate impacts depending upon an employee's gender:

- Discrimination
- Sexual harassment
- Retaliation
- Pregnancy
- Parental leave
- Lactation accommodations

The OIG compared the Department's policies on these topics with those of the CPD, NYPD, and LASD. Overall, the OIG found that the Department possessed the most robust and clearly articulated policies among the reviewed agencies. Notably, unlike the CPD and NYPD, the Department's policies include specific protections against bystander harassment—defined as indirect exposure to unwelcome, offensive, threatening, or abusive conduct in the workplace. Additionally, the Department has established paid parental leave, a benefit not currently offered by the NYPD or the Los Angeles County Sheriff's Department (LASD). The Department's sexual harassment training and pregnancy notification policies do not currently meet the

benchmarks established by comparable law enforcement agencies. Enhancing these policy frameworks supports workplace professionalism, equity, and diversity. In summary, while the Department demonstrates leadership in several key policy domains, opportunities remain to strengthen its training programs and policy development.

III. POLICY COMPARISON RELATED TO DISCRIMINATION, SEXUAL HARASSMENT, AND RETALIATION

In August 2021, the Department issued a Training Bulletin titled, *"Anti-Discrimination, Harassment, and Retaliation Prevention, Identification, and Reporting* (Bulletin)." This guidance addresses issues related to discrimination, sexual harassment, and retaliation.[6] It emphasizes early prevention and instructs supervisors and managers to enforce and maintain a professional work environment by monitoring the workplace and taking prompt action to investigate complaints.[7] In addition, the Bulletin advises that progressive discipline, up to and including termination, is a remedy used to stop unlawful discriminatory behavior.[8]

Importantly, the Bulletin references the City of Los Angeles's (City) policy framework, including federal, state, and local laws. It cites the *City of Los Angeles Discrimination Free Workplace Policy*, adopted on February 12, 1992—revised on February 9, 2022—when it was renamed as *City of Los Angeles Workplace Equity Policy* (Policy).[9]

This updated Policy has substantive revisions and expansions, addressing not only discrimination and harassment but also:

- Bystander harassment
- Retaliation
- Inequitable conduct
- Other forms of unprofessional workplace behavior

According to a representative from the Department's Policy Analysis and Development Section, Constitutional Policing and Policy Bureau,[10] the Department fully adheres to this policy. However, the OIG found that the Policy is not currently accessible on the Department's intranet,

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[6] See Appendix I - LAPD Training Bulletin, Volume L, Issue 9, *"Anti-Discrimination, Harassment, and Retaliation Prevention, Identification, and Reporting,"* dated August 2021.

[7] *Ibid.*

[8] *Ibid.*

[9] See Appendix II – City of Los Angeles (February 9, 2022). *Executive Directive No. 34: Workplace Equity Policy*.

[10] The Policy Analysis and Development Section develop Department policies and procedures and publishes Department directives.

potentially limiting awareness and access for Department employees. Instead, employees must navigate to the City of Los Angeles' Personnel Department website to locate the Policy in full.

A. Discrimination Policy Comparison

The Policy sets clear standards for:

- Who must comply (all City employees, including LAPD employees),
- When and where the policy applies, and
- Consequences for policy violation.

A standout feature of the Policy is its explicit prohibition on the misuse of technology. It bars employees from using *any* technology, communication system, or equipment, regardless of whether City-issued, personal, or otherwise, whether used online or offline, to deliver, display, store, forward, publish, circulate, or solicit material in violation of any form of discrimination and harassment.[11] This provision adds a critical layer of accountability that is absent from comparable policies of the CPD, NYPD, and LASD.[12,13,14]

Furthermore, unlike the broader and often ambiguous language used in CPD's, NYPD's, and LASD's policies, the Department's Policy provides detailed examples of conduct that constitute discrimination. For example, the Policy prohibits:

- Requiring different work appearance, dress, and grooming standards based on sex, gender and/or gender identity, gender expression, religious beliefs, etc.,
- Making employment decisions about any individual based on their natural hair texture or wearing protective styles such as braids, locks, twists, and knots, and
- Requiring an employee or applicant for employment to take an HIV test.[15]

Plain language in the Policy ensures Department employees have a clear and practical understanding of discriminatory conduct. In contrast, policies from CPD, NYPD, and LASD tend to be general and lacking in specificity, which can make it difficult for employees to fully recognize or understand what constitutes discrimination under their respective standards.

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[11] City of Los Angeles (February 9, 2022). *Executive Directive No. 34: Workplace Equity Policy*.

[12] See Appendix III – Chicago Police Department (August 22, 2017). *Employee Resource E01-01: Equal Employment Opportunity Policy*.

[13] See Appendix IV – New York Police Department (March 17, 2025). *Administrative Guide: Employment Discrimination.*

[14] See Appendix V – Los Angeles County Sheriff's Department Manual of Policy and Procedures. Vol. 3, Ch. 1, Sec. 121, *Policy of Equality*.

[15] *Ibid.*

B. Sexual Harassment Policy and Training Comparison

The Department's Policy on sexual harassment is designed to protect employees from unwelcome sexual advances; requests for sexual favors; and other verbal, visual, or physical conduct of a sexual nature.[16] Similar language is found in the policies of the CPD, NYPD, and LASD. It is important to note that, because the Department must necessarily incorporate the City's policy on harassment, the Department also identifies the following conduct as sexual harassment:

- Unwelcome romantic or sexual gifts directed toward another employee including those initiated between employees engaged in a current or former romantic relationship,
- Impeding or blocking movement; and,
- Reprisals or threats after a rejection of sexual advances.[17]

To follow California state requirements, the Department mandates that all non-supervisory employees complete one hour of sexual harassment training, with supervisory employees completing two hours of training once every two years.[18] The LASD follows this same training schedule. In contrast, CPD and NYPD require both non-supervisory and supervisory employees to undergo sexual harassment training on an annual basis. In addition, CPD and NYPD incorporate Bystander Intervention training into their programs, which is not currently offered by the Department for non-supervisory employees. Table No. 2 compares the training requirements for the Department, LASD, NYPD, and CPD.

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[16] *Ibid.*

[17] *Ibid.*

[18] California Government Code §12950.1 (2024).

Table No. 2 Sexual Harassment Training Requirements

Law Enforcement Agency	Sexual Harassment Training (Non-Supervisory)	Sexual Harassment Training (Supervisory)	Bystander Intervention (Non-Supervisory)	Bystander Intervention (Supervisory)	Frequency
LAPD	One Hour	Two Hours	None	Yes[19]	Every Two Years
LASD	One Hour	Two Hours	N/A	N/A	Every Two Years
CPD	Yes	Yes + Additional[20]	Yes	Yes	Every Year
NYPD	Yes	Yes + Additional[21]	Yes	Yes	Every Year

Bystander Intervention training teaches employees safe and positive actions to prevent harm or intervene where there is a risk or perceived risk of sexual harassment to another.[22] The CPD uses the "4 D's" technique – direct, distract, delegate, delay – to provide employees with strategies for addressing or preventing inappropriate conduct. This approach encourages employees to directly confront the behavior, create a diversion, delegate responsibility, and check in with the victim afterwards.

While the Department does give sexual harassment training as required, it currently does not offer Bystander Intervention training to non-supervisory employees. Introducing this type of training could empower non-supervisory employees to take early and proper action when seeing inappropriate behavior. Early intervention can reduce the risk of escalation, foster a culture of accountability, and provide stronger support for those affected by sexual harassment.

C. Retaliation Policy Comparison

The CPD defines retaliation more broadly and in greater detail than the Department's policy. In addition to addressing adverse actions, the CPD's policy explicitly includes "*any inaction of a*

[19] This training is briefly mentioned within the Department's sexual harassment training and is not offered as a standalone course.

[20] All supervisors and managers must complete an added sexual harassment prevention training beyond the training requirement for non-supervisory employees.

[21] New York Police Department's *Equal Employment Opportunity Policy* require commanding officers and managers to meet annually with supervisors to discuss Equal Employment Opportunity policy including sexual harassment and related retaliation.

[22] City of Chicago. *Sexual Harassment Prevention Training Bystander Intervention Model Training*.

damaging, intimidating, or threatening nature."[23] This expands the scope of what can be considered retaliatory behavior, recognizing that not all forms of retaliation involve direct action. For example, withholding information, ignoring emails or messages, or failing to support or defend an employee can all cause harm and create a hostile work environment. These omissions, while passive in nature, can significantly affect an employee's ability to perform their duties and feel safe in the workplace.

In contrast, the Department's Policy defines retaliation as, "adverse employment action or conduct taken against one or more employees."[24] The Department's policy focuses primarily on active forms of retaliation. As a result, passive behaviors such as intentional exclusion or neglect, are not clearly addressed and may fall outside the scope of the Department's current definition.

Additionally, the CPD's policy goes further by including, "*adverse action taken against any individual designed to serve as retribution that is intended to cause emotional stress*."[25] This recognizes that retaliation can take the form of psychological or emotional harm, not just professional setbacks. Examples might include spreading damaging rumors, socially isolating the employee for speaking up, or creating an environment that undermines an employee's mental well-being after they have reported misconduct or exercised their rights.

While the Department Policy does cover a range of adverse employment actions or conduct such as discipline, reprimands, loss of pay, transfer, demotion, reassignment, termination, non-selection for training, promotion, or coveted position,[26] it does not explicitly address emotional or psychological impacts as a form of retaliation. That said, when a Department employee alleges any form of retaliation, whether through direct adverse action or inaction, the Department accepts the complaint and conducts an investigation. The absence of explicit language in the policy does not preclude the Department from reviewing such claims; therefore, it may not be necessary for the policy to specifically reference retaliation by inaction or emotional impact for those allegations to be taken seriously.

IV. POLICY COMPARISON RELATED TO PREGNANCY, PARENTAL LEAVE, AND LACTATION

A. Pregnancy Related Accommodations

[23] Chicago Police Department (August 22, 2023). *General Order G08-05: Prohibition of Retaliation*.

[24] City of Los Angeles (February 9, 2022). *Executive Directive No. 34: Workplace Equity Policy*.

[25] Chicago Police Department (August 22, 2023). *General Order G08-05: Prohibition of Retaliation*.

[26] City of Los Angeles (February 9, 2022). *Executive Directive No. 34: Workplace Equity Policy*.

1. Pregnancy Notification and Disclosure Comparison

The Department requires employees who begin to experience symptoms of pregnancy to consult a physician. Upon confirmation that the employee is pregnant, the employee *shall* give to their commanding officer a written statement from their physician.[27] This process differs significantly from the approaches taken by CPD, NYPD, and LASD, all of which allow employees to disclose their pregnancy at their own discretion.

The CPD "encourages sworn members to notify their unit commanding officers as soon as practicable and are not required to disclose pregnancy, unless or until the employee has reason to believe they cannot continue to safely perform the essential job functions."[28] Similarly, NYPD allows "pregnant employees to remain on full duty status until such time that the employee elects to request a position limitation status from their direct district surgeon, or the employee's high-risk status necessitates position limitation status."[29] By contrast, the Department's policy places a burden on employees to seek medical attention and make a formal disclosure during the early stages of pregnancy, even if they are unprepared to do so. Giving greater flexibility in disclosing pregnancy would empower employees to decide for themselves when their condition may affect their ability to perform full-duty responsibilities.

2. Uniforms Comparison

The Department, CPD, NYPD, and LASD all exempt pregnant employees from wearing standard uniforms. The Department authorizes the use of a maternity uniform for pregnant officers when wearing a standard uniform becomes impractical.[30] The Los Angeles Women Police Officers and Associates (LAWPOA)[31] support pregnant employees through the Maternity Closet program, which offers previously worn maternity uniforms at no cost. LAWPOA also covers the cost of up to two alterations for the borrowed uniforms. If the assigned duty does not require a uniform, pregnant employees may wear business attire instead.

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[27] Department Manual Section 3/762.93, *Assignment of Pregnant Employees*, dated Quarter 1, 2025.

[28] Chicago Police Department (June 8, 2023). *Employee Resource E01-18: Pregnancy-Sworn Department Members*.

[29] New York Police Department (March 17, 2025). *Administrative Guide: Pregnancy Related Guidelines for Uniformed Members of the Service*.

[30] Department Manual Section 3/640.10, *Maternity Uniform*, dated Quarter 1, 2025.

[31] LAWPOA is a non-profit organization that supports and advances women in law enforcement by providing career development, professional networking, and promote women in the field.

B. Parental Leave Comparison

Through collective bargaining with the City, the Department established paid parental leave for all sworn employees, regardless of gender. Eligible employees may receive up to 480 hours of paid parental leave for a pregnancy-related disability or to bond with a new child through birth, adoption, or foster care. Employees can utilize this leave either continuously or intermittently within 12 months of the child's arrival.

To qualify for the benefit, employees must complete 12 months of employment and work at least 1,250 hours during the preceding year. Additionally, Department policy requires an employee to submit a private physician's written statement if they request to return to duty less than three months after childbirth.

A comparative review reveals that the Department and the CPD offer 12 weeks of paid parental leave, exceeding the provisions of the other analyzed agencies. In contrast, the NYPD and the LASD do not provide paid parental leave for sworn personnel. The NYPD does, however, maintain a policy that allows uniformed members to take up to 365 days of unpaid leave to bond with a child, with the option to utilize accrued personal time during this period.

While parental leave policies vary across law enforcement agencies, the competitive benefits offered by the Department and CPD demonstrate a significant commitment to employee wellness. These comprehensive provisions directly support personnel during critical family transitions and reinforce the impact of family-friendly practices within contemporary policing.

C. Lactation in the Workplace

1. Lactation Accommodation Policy Comparison

The Department adheres to the *City of Los Angeles Lactation Accommodation Policy*, which was first implemented on October 15, 2011, per federal and California state laws.[32] Subsequent State laws improved protections and conditions for nursing employees, which were incorporated into revised versions of the policy. In September 2024, the City issued its current Lactation Accommodation Policy which accommodates lactating employees' needs by providing:

- Time to express milk or breastfeed.
- An appropriate private location:
  - near the nursing employee's work area and a refrigerator suitable for storing milk;
  - with access to electricity and nearby a sink with running water;
  - with comfortable seating and a surface to place a breast pump and personal items; and,
  - be clean, safe, and free of hazardous materials.

[32] City of Los Angeles. (September 2024). *City of Los Angeles Lactation Accommodation Policy*.

To ensure awareness, the Department must give the *Lactation Accommodation Policy* to every incoming employee and to all employees biennially. Additionally, the policy must be provided before an employee begins maternity leave and again upon their return to work. Similar protections are in place at CPD and LASD, both of which ensure access to a private space where nursing employees can comfortably and safely express milk during work hours. The Department's Policy supports the need for workplace environment that upholds the health, privacy, and dignity of lactating employees.

2. LAPD's Lactation Accommodation Questionnaire

In June 2024, the OIG distributed a lactation accommodation questionnaire to all 21 geographic Areas to assess compliance with the revised *Lactation Accommodation Policy*. The purpose of the questionnaire was to figure out whether each Area was meeting the required standards for providing proper accommodations to lactating employees. The questionnaire focused on whether:

- the Area has a designated space for lactation; if so, the location of the space.
- the space is clean, safe, and free of hazardous materials.
- the space has working electrical outlets or alternative access to electricity.
- the space contains comfortable seating with a surface to place a breast pump and personal items.
- the space is shielded from view and free from intrusion.
- the employee has access to a sink with running water and a refrigerator.
- the employee must notify anyone such as a supervisor prior to taking a break to lactate.
- the employee is allowed to break for lactation during work hours.
- there are any officers out in the field that need lactation accommodation.
- any issues, concerns, or recommendations with the lactation policy.

The OIG confirmed that all 21 geographic Areas comply with the Department's *Lactation Accommodation Policy*. Only the Van Nuys Area reported a deficiency, noting worn-out furniture in its lactation space. To resolve this, the Van Nuys Area utilized funding from the Los Angeles Women Police Officers and Associates (LAWPOA)—which offers up to $250 per location for essential amenities—to replace the worn items and restore full compliance.

V. CASE REVIEWS – Assessment of Workplace Policy Enforcement

To assess the Department's enforcement of workplace policies, the OIG reviewed complaint investigations to evaluate the thoroughness of the investigative process and the appropriateness of the final adjudications. This review also analyzed complaint resolution rates, focusing specifically on fully adjudicated investigations involving discrimination, harassment, retaliation, and other behaviors affecting the work environment. The scope encompassed complaints filed by all Department employees, regardless of gender, closed between January 1, 2024, and October 31, 2024.

During this ten-month period, the Department closed 2,146 complaint investigations.[33] During this ten-month period, the Department closed 2,146 complaint investigations. From this total, the OIG isolated 71 investigations involving workplace-related misconduct that could negatively impact the work environment. The OIG categorized these 71 investigations by the primary nature of the alleged misconduct:

- **Discrimination (Non-Gender):** 24% involved discrimination based on protected characteristics other than gender.
- **Detrimental Workplace Behavior:** 20% involved behavior disruptive to the work environment.
- **Retaliation:** 14% involved retaliatory actions.
- **Gender-Related Discrimination:** 11% involved gender-based discrimination.

Table No. 3 provides a detailed breakdown of these 71 investigations by misconduct category.

Table No. 3 Nature of Misconduct

Type	Number of Investigations	Percentage of Investigations
Discrimination	17	24%
Detrimental Workplace Behavior	14	20%
Retaliation	10	14%
Gender-Related Discrimination	8	11%
Improper Remarks – Non-Discriminatory[34]	7	10%
Harassment	6	8%
Sexual Harassment	6	8%
Hazing	2	3%
Insubordination	1	2%
TOTAL	71	100%

Of the 71 investigations reviewed, a total of 95 individual complainants were identified. Of these, 55% self-identified as female and 45% as male. Among the complainants, 28% reported misconduct related to discrimination not associated with gender, while 21% reported experiencing detrimental workplace behavior.

Allegations of sexual harassment accounted for 16% of the complaints, with 93% of those submitted by female officers. Complaints specifically related to gender discrimination comprised 8% of the total, with 88% submitted by female officers.

[33] The OIG obtained this data from the Department's Complaint Management System.

[34] These remarks were inappropriate and included the use of foul language, name calling, or personal insults.

Overall, female officers filed gender discrimination complaints at a rate of at least seven times higher than their male counterparts, and sexual harassment complaints at a rate 14 times higher. These figures suggest notable disparities in workplace experiences based on gender. Table No. 4 provides a detailed breakdown of the 95 complainants by gender and the nature of the alleged misconduct.

Table No. 4 Nature of Misconduct by Complainant Gender

Type	No. of Female Complainants	No. of Male Complainants	Total
Detrimental Workplace Behavior	6	14	20
Discrimination	16	11	27
Gender-Related Discrimination	7	1	8
Harassment	2	3	5
Hazing	1	0	1
Improper Remarks – Non-Discriminatory[35]	2	5	7
Retaliation	4	8	12
Sexual Harassment	14	1	15
TOTAL	52	43	95

A total of 152 officers were identified as subjects of allegations. Of these, 65% were male and 35% were female. The most frequently reported allegations involving male officers included detrimental workplace behavior (25%), discrimination (21%), and retaliation (19%).

In cases involving sexual harassment, 11 of the 12 accused officers were male, indicating a notable gender disparity in this category. Similarly, allegations of gender-related discrimination were more commonly associated with male officers, with 15 male officers named compared with 7 female officers.

These trends suggest that more serious forms of misconduct—particularly those involving gender-based concerns such as sexual harassment and gender discrimination—were disproportionately associated with male officers. Table No. 5 provides a detailed breakdown of the 152 accused officers by gender and the nature of the alleged misconduct.

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[35] These remarks were inappropriate and included the use of foul language, name calling, or personal insults.

Table No. 5 Nature of Misconduct Accused Officers Gender

Type	No. of Female Accused Officers	No. of Male Accused Officers	Total
Detrimental Workplace Behavior	10	25	35
Discrimination	14	21	35
Gender-Related Discrimination	7	15	22
Harassment	9	4	13
Hazing	1	0	1
Improper Remarks – Non-Discriminatory[36]	4	4	8
Insubordination	1	0	1
Retaliation	6	19	25
Sexual Harassment	1	11	12
TOTAL	53	99	152

To evaluate the Department's investigative and adjudicative practices, the OIG reviewed a sample of 29 investigations from the 71 identified cases. These 29 investigations contained 215 individual allegations. While the majority focused on workplace culture, some allegations involved general misconduct, such as neglect of duty or making false statements.

The OIG categorized each of the 29 investigations by the primary nature of the allegation:

- **Discrimination (Non-Gender):** 35% involved discrimination based on protected characteristics other than gender.
- **Gender-Based Discrimination:** 21% involved gender-based discrimination, including inappropriate remarks or conduct directed at an individual's gender.

Table No. 6 provides a detailed breakdown of these 29 investigations categorized by the nature of the alleged misconduct.

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[36] These remarks were inappropriate and included the use of foul language, name calling, or personal insults.

Table No. 6 Nature of Misconduct

Type	Number of Investigations	Percentage of Investigations
Discrimination	10	35%
Gender-Related Discrimination	6	21%
Retaliation	5	17%
Improper Remarks – Non-Discriminatory[37]	4	14%
Sexual Harassment	2	7%
Detrimental Workplace Behavior	1	3%
Hazing	1	3%
TOTAL	29	100%

A. OIG's Review Findings

The OIG conducted a detailed review of 29 complaint cases and found that the Department completed thorough investigations and appropriately adjudicated the allegations in 27 cases. In the remaining two cases, the OIG found deficiencies in investigative thoroughness and/or adjudication. However, these issues were unremarkable and did not affect the final adjudications.

Case No. 1 *(Sample No. 1 of 29)*
Adjudication Issue: The complainant alleged that she was treated differently than her male counterparts, claiming they received much lesser penalties for similar or more severe misconduct. The allegation was adjudicated as Non-Disciplinary – No Misconduct. According to the Department's rationale, because complaint investigations go through several levels of review, such reviews serve as a check and balance on the system, and therefore, there was no indication of gender bias in the penalty imposed.

However, the OIG found that this rationale did not adequately address the core of the complainant's allegation—that she received a harsher penalty than her male counterparts who engaged in similar misconduct. The investigation provided information to substantiate a determination that the complainant received the appropriate penalty in an underlying complaint based on the Department's penalty guide. However, the commanding officer who wrote the rationale failed to cite to investigative materials to support their adjudication. Relying solely on the existence of a multi-level review process does not substantiate the conclusion that her penalty was fair or free from gender bias.

Case No. 2 *(Sample No. 13 of 29)*
Adjudication Issue: In this case, the adjudicator grouped two separate allegations into a single finding: one alleging that the accused spoke to the complainant in an inappropriate manner and another alleging that the accused inappropriately told the complainant that her hairstyle was out

[37] These remarks were inappropriate and included the use of foul language, name calling, or personal insults.

of policy due to her race and gender. The Department should have investigated three allegations misconduct: 1) that the accused spoke to her in an inappropriate manner, 2) that the accused employee inappropriately told her that her hairstyle was out of policy due to her gender, and 3) that the accused employee inappropriately told her that her hairstyle was out of police due to her race. Instead, the adjudicator only considered the Department's grooming standards, and did not directly assess the alleged bias or misconduct in how the grooming policy was applied or communicated.

B. Unresolved Misconduct Complaints

Of the 29 cases reviewed, six (21%) resulted in findings that the alleged misconduct had occurred. Of these six cases, three were sustained, meaning that the 15 allegations involving discrimination and sexual harassment were supported by the evidence and the Department took formal disciplinary action. The remaining three resulted in, "Employee's Actions Could Have Been Different," a non-disciplinary disposition where the Department believes an employee's conduct can be best addressed through counseling and/or training.

The other 23 cases (79%) were classified as Out of Statute, Insufficient Evidence to Adjudicate, Unfounded, Not Resolved, Exonerated, or No Misconduct.

VI. SURVEY OF LAPD SWORN PERSONNEL

On May 16, 2025, the OIG distributed the "LAPD Sworn Personnel Workplace Experience Survey" to all sworn employees.[38] The OIG developed the survey questions based on current Department policies, City policies, and the Department's 2023–2025 Strategic Plan as reference points. A total of 494 sworn employees—approximately 6% of the Department's sworn workforce—voluntarily participated.[39] The 30-question survey covered a range of topics, including sexual harassment, retaliation, discrimination, promotions, pregnancy, parental leave, lactation accommodation, and other workplace issues. Among respondents, 23% identified as women, 73% as men, and 4% did not disclose their gender. Based on workforce demographics, approximately 6.8% of sworn women and 5.1% of sworn men responded to the survey.

Most respondents (61%) reported assignments in patrol or specialized units. Just over half (51%) identified their rank as police officer. Additionally, approximately 44% of respondents had served with the Department for 21 years or more.

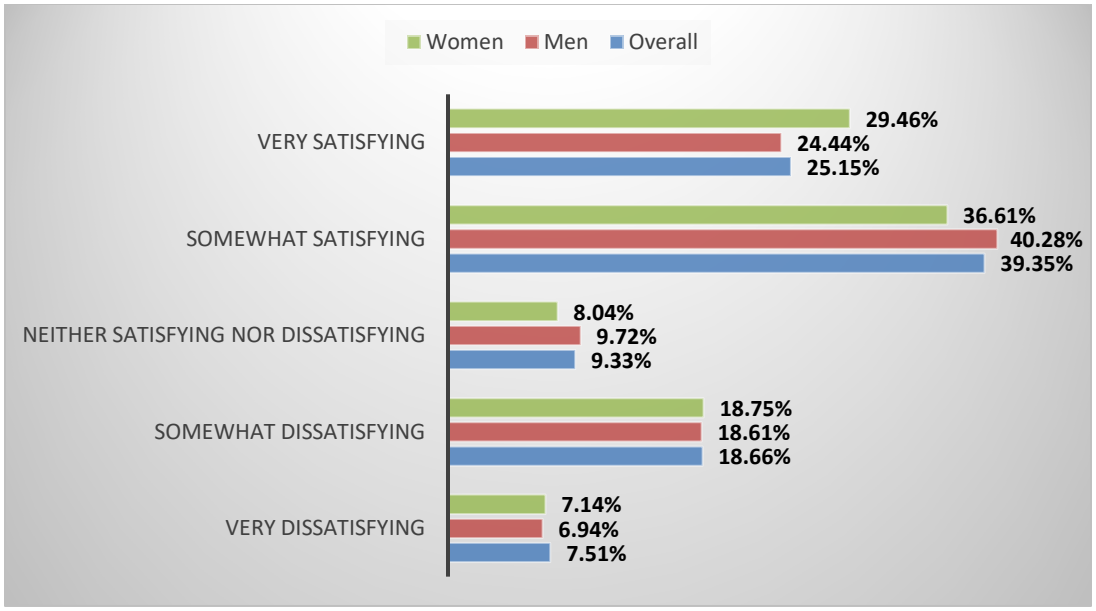
The survey asked employees to rate their overall experience working for the Department. Approximately 64% of respondents reported being somewhat or very satisfied. Notably, women reported overall job satisfaction levels about 5% higher than their male counterparts. Chart No.

[38] The OIG collected responses for a two-week period (May 16, 2025, to May 28, 2025).

[39] According to the LAPD Deployment Roster Dashboard, a total of 8,722 sworn personnel were employed by the Department as of May 16, 2025.

1 illustrates job satisfaction levels by gender, along with the overall satisfaction rate among all 494 respondents.[40]

Chart No. 1 Overall Experience

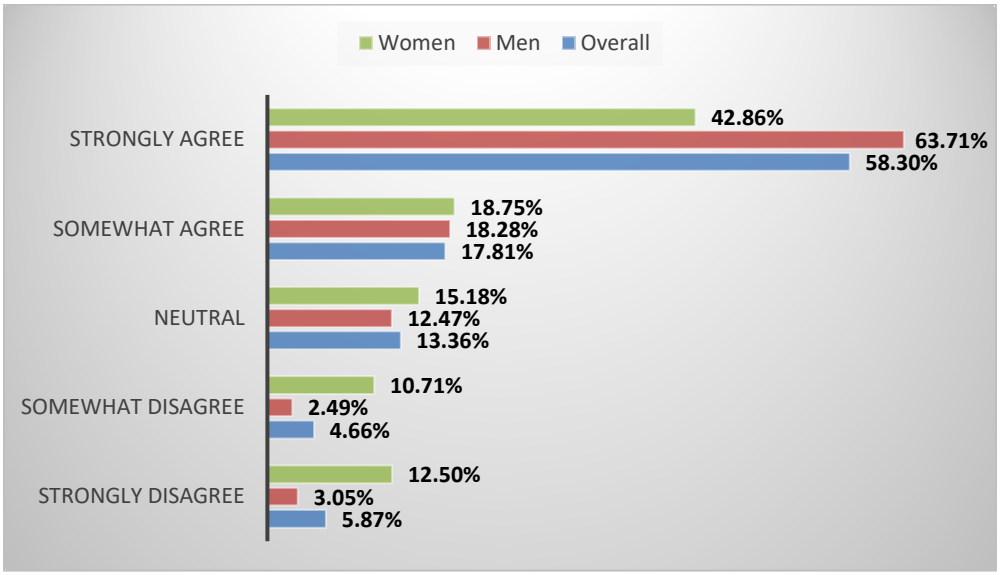


The survey included questions about inclusion, fairness, peer recognition, and whether the workplace is free from sexual harassment and gender discrimination. Overall, responses to these questions were generally positive except on perceptions of the workplace being free of sexual harassment and gender discrimination. While 64% of men strongly agreed that the workplace is free of sexual harassment, 43% of women shared that view, revealing a 21% gap in perception. Chart No. 2 compares these perceptions among men, women, and the overall respondent group.

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[40] The overall of the 494 respondents include 19 of the respondents that did not disclose their gender.

Chart No. 2 Free of Sexual Harassment at the Workplace

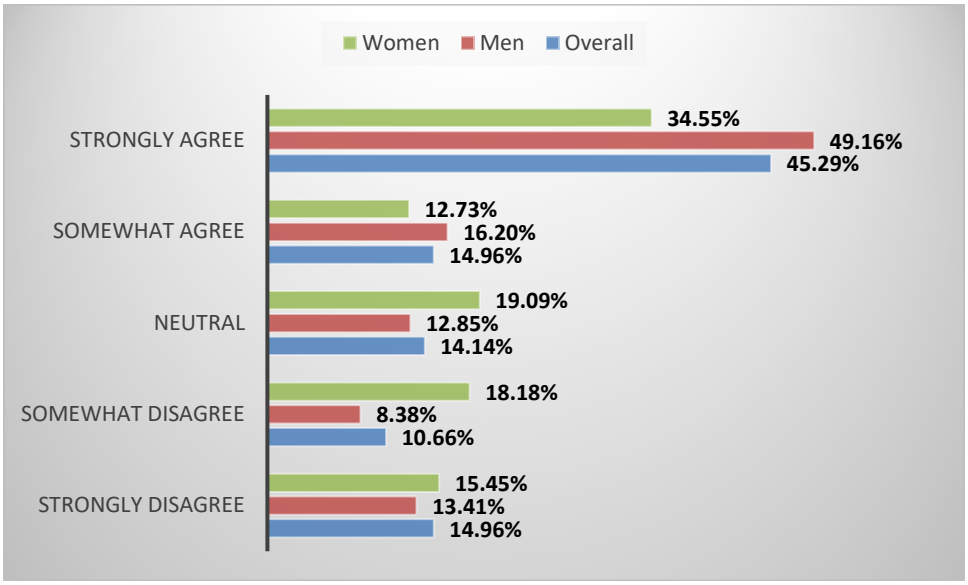


The survey asked employees whether they believed the workplace was free of gender discrimination. Among respondents, 49% of men strongly agreed that the workplace was free of gender discrimination, compared with 35% of women—reflecting a 14% gap in perception. While some respondents expressed confidence in the Department's fairness, others raised concerns about the role of diversity, equity, and inclusion (DEI) in decisions related to special assignments, promotions, and time off. Notably, some male respondents who agreed that the workplace is free of discrimination still voiced concerns about perceived gender bias. Comments included: "*females are favored by the Department*," "*the Department provides so much support for women when it comes to promotions, that it excludes males*," and "*there has been a heavy disproportionate push to promote females and minorities into Command Staff ranks regardless of their qualifications*."

Chart No. 3 illustrates the differences in perceptions about gender discrimination among men, women, and the overall respondent group.

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Chart No. 3 Free of Gender Discrimination in the Workplace



The survey asked employees whether they felt confident that Department personnel would be supportive if they reported incidents of sexual harassment, gender discrimination, or retaliation. Approximately 30% of women strongly disagreed that they would feel supported, compared with 18% of men—revealing a 12% gap in perceived support.[41]

The survey found gender differences in perceptions of how effectively the Department addresses issues related to sexual harassment, gender discrimination, and retaliation. Approximately 35% of women strongly disagreed that the Department conducts thorough investigations, while 20% strongly agreed.

When asked whether supervisors take prompt action to address reported or observed incidents of sexual harassment, gender discrimination, or retaliation, approximately 26% of women strongly disagreed, compared with 11% of men. This reflects a 15% gender gap in negative perceptions. Women were more likely than men to perceive that supervisors do not respond promptly to such concerns.[42]

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[41] *See* Appendix VI for Chart No. 4 which compares perceptions among men, women, and the overall employee population regarding whether they feel supported by the Department when reporting incidents of sexual harassment, gender discrimination, or retaliation.

[42] *See* Appendix VI for Chart No. 5 and 6. Chart No. 5 shows how men, women, and the overall sworn employee population perceive whether the Department conducted thorough investigations into reports of sexual harassment, gender discrimination, or retaliation. Chart No. 6 compares the same groups' perceptions about whether supervisors took prompt action after such incidents were reported.

The survey examined employee perceptions of promotions, focusing on fairness, gender-based favoritism, and the role of merit. Approximately 33% of women reported feeling very supported in their promotional opportunities, while 11% reported feeling very unsupported. In contrast, 20% of men reported feeling very supported, and 30% reported feeling very unsupported; suggesting that some male employees perceive less support than their female counterparts. More than 40% of men strongly believed that promotions were unfair, often citing concerns about initiatives such as "30 by 30" and diversity, equity, and inclusion initiatives. These respondents expressed the view that such initiatives detract from merit-based decisions. Common themes in open-ended responses included statements such as:

- "*30 by 30 inherently takes away from merit-based promotions when there is an obvious quota that needs to be filled*."
- "*DEI and 30 by 30 is the goal; merit is on the back burner*."
- "*Females are given promotion just because they are females*."

Women's views on promotional fairness were more divided. While 21% strongly agreed that promotions were fair, 24% strongly disagreed, showing uncertainty and a lack of confidence in the system. A recurring theme in women's open-ended responses was concern that the 30x30 Initiative may negatively impact their promotion experiences. Examples included:

- "*My gender shouldn't have anything to do with whether or not I get a promotion*."
- "*I feel that the 30 for 30 program sets females back from feeling equal to their male partner*."
- "*If a woman is promoted, people believe it was because of DEI only. We have created an uphill battle for ourselves*."
- "*As a woman who has worked hard in this Department, I am offended by the 30X30 campaign*."

Despite differing views on gender favoritism, more than 50% of both men and women strongly agreed that promotions were not based on merit. Another common theme across open-ended responses from both groups was the belief that personal connections—"*who you know*"—significantly influence promotional outcomes.[43]

The survey asked employees about their experiences with pregnancy and parental leave. Among women who experienced pregnancy and/or childbirth while employed with the Department, 37% reported that their pregnancy or parental leave negatively affected their career.[44] In contrast, 11% of men reported a negative career impact from taking parental leave.[45]

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[43] *See* Appendix VI for Chart No. 7, 8, and 9. These charts compare the perceptions of men, women, and the overall employee population about promotional practices within the Department.

[44] Out of the 494 respondents, 66 (13%) indicated that this question applied to them.

[45] Out of the 494 respondents, 148 (30%) indicated that this question applied to them.

When asked about support from supervisors or commanding officers during pregnancy or upon returning from leave, 57% of all employees reported feeling somewhat or very supported.[46] Women reported slightly higher levels of support than men (61% compared to 58%).

Two common themes appeared from open-ended responses:

1. Insufficient time off for childbirth and bonding with a new child.
2. The requirement to use vacation and sick leave for pregnancy and parental leave.

Since the survey was conducted, the City has approved 480 hours of paid parental leave for all sworn employees, directly addressing concerns about the use of personal leave banks. The survey also asked sworn employees whether they encountered issues with having adequate time and a private location to express milk after returning from parental leave. While 65% reported no issues, 35% did. Among those who had a child since 2020, the most frequently cited concerns were:

1. Lack of privacy due to shared use of lactation rooms.
2. Difficulty finding time to express milk while assigned to patrol duties.

Regarding mentorship, approximately 30% of sworn personnel reported feeling supported by a Department mentor or supervisor. However, over 50% of respondents wrote down that mentorship within the LAPD is lacking. Common themes in open-ended responses included:

- "*There is no mentor program in the Department*."
- "*Mentorship is an absolute joke on this Department*."

When asked whether they would recommend employment with the LAPD to women, 59% of sworn personnel said they would. However, more men than women said they would recommend the Department to women (62% vs. 49%). In contrast, when asked about recommending the LAPD to men, 55% of sworn personnel responded affirmatively, with more women (61%) than men (52%) saying they would encourage men to join the Department.

VII. FINDINGS AND RECOMMENDATIONS

1. **Finding**: The OIG found that the City's *Workplace Equity Policy* was not available on the Department's intranet. Instead, it was hosted on the City's Personnel website, which is separate and not easily accessible to Department employees. Additionally, workplace-related directives and policies were scattered across multiple sources, making them difficult to find.

[46] Out of the 494 respondents, 235 (48%) indicated that this question applied to them.

Recommendation: Centralize all workplace-related policies and directives into one clearly labeled, easily accessible location on the Department's intranet. Ensure that updates are regularly maintained and easily searchable.

2. **Finding**: Unlike the CPD and NYPD, which require annual sexual harassment and equity training, the Department currently requires this training only once every two years.

   Recommendation: Implement mandatory annual workplace equity training for both supervisory and non-supervisory employees.

3. **Finding**: CPD and NYPD incorporate bystander harassment training into their equity programs for both supervisors and non-supervisory employees. This equips all employees with the tools to safely and effectively intervene when witnessing inappropriate conduct, which encourages early intervention and share responsibility.

   Recommendation: Develop and train bystander harassment training to all employees, regardless of ranks.

4. **Finding**: The Department's current pregnancy disclosure policy requires early disclosure to supervisors, limiting pregnant employees' ability to disclose their condition on their own terms. Additionally, the policy requires pregnant employees to submit a written statement from their physician to their commanding officer confirming the pregnancy. This requirement can create discomfort and stress particularly during the initial stages of pregnancy.

   Recommendation: Revise the pregnancy disclosure policy to allow voluntary disclosure unless the pregnancy affects duty performance. Additionally, eliminate the requirement for pregnant employees to submit a written statement from their physician unless a workplace accommodation or modification to working conditions is requested or necessary. This aligns with CPD and NYPD practices and provide greater privacy for employees.

5. **Finding**: The OIG found that some internal workplace investigations conclude without a definitive resolution. Allegations classified as Not Resolved, Insufficient Evidence to Adjudicate, or Out of Statute often do not resolve the underlying workplace conflict. As a result, inappropriate behavior may continue and employees are left without closure or meaningful support, potentially discouraging future reporting, and eroding trust in the investigative process.

   Recommendation: Pilot a conflict resolution or mediation program to address ongoing workplace issues between involved parties, particularly in unresolved cases. The Department should report back to the BOPC within one year of implementation with an assessment of the program's effectiveness and measurable outcomes.

In addition, hold supervisors more accountable for addressing behavioral issues early and fostering a respectful work environment. This may include mandatory documentation of informal interventions and participation in resolution efforts. These measures will reinforce the Department's commitment to supporting a respectable work environment.

6. **Finding**: The OIG's findings from the LAPD Sworn Personnel Workplace Experience Survey show a significant mentorship gap within the Department. Approximately 30% of sworn personnel reported feeling supported by a Department mentor or supervisor, while over 50% of respondents stated that mentorship within the LAPD is lacking. The data suggest that existing mentorship efforts are insufficient and do not adequately meet the expectations or professional development needs of many sworn personnel.

   Recommendation: Develop and implement a mentorship program that pairs junior officers with experienced mentors, with a primary focus on the professional needs and career aspirations of participating officers rather than organizational management priorities. This approach ensures the program remains relevant, practical, and responsive to the challenges officers face in their day-to-day roles and long-term career planning.

   The mentorship program should be structured yet flexible, allowing mentor-mentee pairs to tailor discussions and development goals around key areas such as career development, skill development, leadership preparation, and navigating Department culture. Emphasis should be placed on building trust, encouraging open dialogue, and fostering a supportive environment for professional growth.

   Additionally, the mentorship program should include training on strategic leadership, conflict resolution, and organizational navigation. This could address the widespread perception that mentorship development is lacking and improve career development and retention.

VIII. DEPARTMENT RESPONSE

INTRADEPARTMENTAL CORRESPONDENCE

May 26, 2026
1.13

TO: Office of the Inspector General

FROM: Commanding Officer, Professional Standards Bureau

SUBJECT: RESPONSE TO THE OFFICE OF THE INSPECTOR GENERAL REGARDING THEIR REVIEW OF LAPD POLICIES THAT IMPACT SWORN WOMEN PERSONNEL.

Professional Standards Bureau (PSB) reviewed the Office of the Inspector General's (OIG) report titled, "REVIEW OF LAPD POLICIES THAT IMPACT SWORN WOMEN PERSONNEL." According to the report, the OIG conducted a comprehensive review of the Los Angeles Police Department's (LAPD or Department) policies and procedures, then compared them with three major law enforcement agencies. A portion of the report consisted of case reviews, which specifically pertained to PSB.

The OIG conducted a detailed review of 29 personnel complaints and found the Department completed thorough investigations and appropriately adjudicated the allegations in 27 cases. In the remaining two cases, the OIG found deficiencies in investigative thoroughness and/or adjudication; however, the issues were unremarkable and did not affect the final adjudications.

Concern No. 1:

In regard to Case No. 1 (OIG Sample 1 of 29), the OIG highlighted a concern with the adjudication. The rationale failed to cite investigative material to support the adjudication, relying solely on the existence of a multi-level review process. As such, the rationale did not substantiate the conclusion that the complainant's penalty was fair or free from gender bias.

Response: Agree

The complainant alleged gender bias when she received a harsher penalty for misconduct than her male counterparts. The allegation was adjudicated as Non-Disciplinary – No Misconduct. The rationale in the Letter of Transmittal (LOT) based the adjudication on an internal Departmental review process and the Sworn Penalty Guide for Personnel Complaints (Penalty Guide), Special Order No. 15, dated September 15, 2016.

Professional Standards Bureau agrees the adjudicator should have provided additional details in the rationale to specifically address gender bias, including the statement from the commanding officer who denied the allegation. Conversely, the adjudicator's reference to the Penalty Guide supported the adjudication to some degree. The Department implemented the Penalty Guide and Penalty Assessment Factors to ensure "fairness, consistency, and clearly stated expectations..."

The employee's bureau commanding officer and PSB's Review and Evaluations Section had the opportunity to review the recommended penalty and ensure it was fair and appropriate. Despite the lack of a detailed rationale regarding the allegation of bias, the investigation properly addressed the concern. As such, no further action is warranted.

Concern No. 2:

In regard to Case No. 2 (OIG Sample 13 of 29), the OIG highlighted a concern with the adjudication. The adjudicator grouped two separate allegations into a single finding. The adjudicator considered the Department's grooming standards but failed to directly address the alleged bias.

Response: Agree

The two allegations associated with the OIG's concern were 1) a Department supervisor spoke to the complainant in an inappropriate manner, and 2) a Department supervisor inappropriately advised the complainant her hair was out of policy due to her race and gender.

Professional Standards Bureau agrees the adjudicator should have addressed the bias concern independently. The rationale in the LOT primarily focused on the Department's policy regarding grooming standards and the supervisor's duty to enforce it. The adjudicator grouped the two allegations into one rationale, and recommend it be classified as Non-Disciplinary, Actions Could Have Been Different. Despite the lack of specific rationale regarding the allegation of bias, the investigation properly addressed the concern. As such, no further action is warranted.

ADDITIONAL:

The OIG recommended a pilot program for conflict resolution or mediation to address ongoing workplace issues. The Department until recently (2023) had a mediation/de-escalation training hosted by the Straus Institute for Dispute Resolution, Pepperdine School of Law. However, due to funding issues this program was halted. Professional Standards Bureau agrees a conflict management/mediation training should be re-implemented. The program was previously coordinated through Risk Management Policies Division but may better suited to be coordinated by the Ombuds office under Employee Relations Group. The OIG's recommendation would be similar to the Alternate Complaint Resolution, which has proven to be an effective way to resolve complaints through open dialogue.

If you have any further questions, please contact Detective III Jason De La Cova, PSB, Review and Evaluation Section, at (213) 996-2771.

BILLY B. BROCKWAY, Deputy Chief
Commanding Officer
Professional Standards Bureau

Appendix A

TRAINING BULLETIN

Los Angeles Police Department | Michel R. Moore, Chief of Police

Volume L, Issue 9 | August 2021

ANTI-DISCRIMINATION, HARASSMENT, AND RETALIATION PREVENTION, IDENTIFICATION, AND REPORTING

Every employee has the right to work in an environment that is nondiscriminatory. State and Federal laws and our Department policies serve to guide our conduct and provide protections and reassurance of equitable treatment.

Early Prevention

Prevention through policy, training, supervision and discipline are ways to manage unlawful discrimination, harassment and retaliation. The Department and the City have policies that clearly state and reinforce the principles of nondiscrimination. The Department's training programs provide a context for applying policy guidelines and discussing repercussions of such behavior to improve employee knowledge, skills, and awareness. Progressive discipline, up to and including termination, is also one remedy to stop unlawful discriminatory actions. Most importantly, supervisory and management teams should enforce and maintain a professional work environment by monitoring the workplace, taking prompt action to investigate complaints, and keeping involved parties informed. It is equally important for employees to be honest and forthright, using the resources at their disposal, to address concerns in a timely manner.

Accurate Identification

Having a working knowledge of common equal employment opportunity (EEO) definitions and monitoring the work environment for early warning signs and symptoms are essential tools to identify potential problems accurately and efficiently, such as interpersonal conflicts, biases, and/or prejudices which may escalate into unlawful discriminatory conduct. Understanding the difference between conflict within a work team and unlawful discrimination should assist all personnel in the accurate identification of circumstances leading to potential incidents of unlawful discrimination, harassment, and/or retaliation.

Unlawful discrimination is any employment practice or decision which intentionally or unintentionally results in the unequal treatment of an individual or group based on their membership in one of the protected classes for other than job related (bona fide occupational qualification) reasons. The three primary types of unlawful discrimination are (1) disparate treatment, (2) adverse impact and (3) failure to provide reasonable

accommodations.

Disparate treatment is when an individual is treated differently than others on the basis of race, color, ancestry, national origin, religion, creed, age, physical or mental disability, marital status, sex, gender (including pregnancy, childbirth, breastfeeding or related medical conditions), sexual orientation, gender identity, gender expression, medical condition, genetic information, marital status, and military or veteran status. Adverse impact is a personnel system or practice that appears neutral, but adversely affects individuals of a certain class or group on a disproportionate basis. Lack of reasonable accommodation occurs when an employer does not make a reasonable modification to the workplace to allow equal employment opportunities for an individual with a known physical or mental limitation/disability.

Sexual harassment is one of the most common forms of unlawful sex discrimination in the work environment. It is characterized by unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature. It typically occurs under three conditions. The first two are often referred to as quid pro quo and include: (1) submission to sexual advances, requests and/or conduct as either explicitly or implicitly made a term or condition of employment or (2) when submission to or rejection of such conduct is used as the basis for employment decisions. The third is referred to as hostile work environment and described as: (3) conduct that has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, and/or offensive working environment.

Retaliation is defined as an adverse employment action taken against an employee for engaging in protected activity. An adverse employment action includes an action that would cause a reasonable employee to be deterred from engaging in a protected activity or an action in direct response to an employee engaging in a protected activity. Adverse employment actions may include, but are not limited to, negative performance evaluations, negative Employee Comment Sheets, the imposition of discipline or denial of: paygrade advancement, coveted assignment or promotional opportunity, or change of assignment.

Protected activities include:

a) Opposing, reporting, or participating in any claim, lawsuit, or investigation concerning unlawful discrimination or sexual harassment;
b) Filing a grievance or participating in any unfair labor complaint;
c) Taking advantage of any labor right or benefit such as using sick or family leave, seeking compensation for overtime worked, or filing an objectively valid work-related claim for damages;
d) Reporting misconduct of another Department or City employee to the Office of the Inspector General, or any Department or government entity; or
e) Supporting, assisting or cooperating in a misconduct investigation.

The Department also prohibits adverse acts against another employee when the

employee steps forward to identify any form of misconduct or wrongdoing. This too is considered serious misconduct.

Other forms of unlawful hostile work environment include situations when an employee is subjected to unwelcome, and/or intimidating, and/or demeaning conduct which is severe or pervasive enough that it interferes with and disrupts work performance. Therefore, monitoring for early warning signs of behavior that are not conducive to a professional work environment is paramount to preventing unlawful discrimination. This monitoring is the responsibility of all Department managers and supervisors. Any and all such incidents shall be handled swiftly, and misconduct reported without delay.

Reporting Avenues

Employees have a right to complain and take action when they believe they are the target of discrimination, harassment or retaliation. Every employee is encouraged to inform or ask the offending party to cease the unwelcome behavior. However, they are not required to do so. An employee who does not want to confront the offender must immediately notify a supervisor or a Department manager so the offender can be advised to stop the unwanted acts. If somebody requests these behaviors stop, the conduct shall be terminated immediately. Failure to stop the acts may result in formal allegations of misconduct.

Individuals who experience unwanted behavior at work can often quickly stop the behaviors by communicating personal boundaries with co-workers. Tolerance with coworkers is important in reducing misunderstandings, increasing awareness and promoting mutual respect. Tolerance does not mean compromising professionalism and respect.

There are times in which approaching the offender is not feasible. In those circumstances, employees are strongly encouraged to seek immediate assistance through their chain of command, and/or using the resources listed at the end of this training bulletin. When unwanted behavior continues after a coworker or supervisor has asked for it to stop, it likely would be perceived as harassment and/or retaliation. Repeated conduct is more likely to be considered offensive, threatening, and intrusive rather than something which is a one time, single or isolated occurrence.

Employee Responsibility

Every employee has the responsibility to stop unprofessional behavior in the workplace. We must all be respectful of coworkers and strive toward maintaining a work environment free of any form of discrimination. Any employee who reasonably believes that he or she has been the subject of or is aware of retaliation, discrimination or sexual harassment as defined by the parameters outlined in this training bulletin, shall report it without delay. Employees may contact any Department supervisor, the Work Environment Liaison Section, Internal Affairs Group, Risk Analysis Section, or the Office of the Inspector General.

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In almost every instance, immediate reporting will enable prompt action, generally in a positive and progressive manner, which will be the least disruptive to the involved individuals and the Department. Delayed reporting, while not uncommon, most often results in a continuation and an increase in the severity of the behavior, disruption of the workplace, along with increased adverse personal impact, as well as fiduciary liability to the Department and the City.

Additionally, employees who are unsure if the behavior meets the definitions outlined in this bulletin, questions whether the offending party was fully aware of the impact of their actions or is hesitant to conclude there is in fact retaliation, discrimination and/or harassment as opposed to a miscommunication or misunderstanding; are encouraged to reach out to the Ombuds Section or Workplace Investigation Section (PSB) for assistance and advice.

Department Management, Command, and Supervisory Responsibility

All levels of management and supervision have a legal responsibility to follow the Department's reporting procedures. As an agent of the employer (the City), managers and supervisors must have a thorough understanding of the law and the various policies and procedures affecting employment discrimination to protect the interest of the victim(s), other employees, and the Department. Failure to take a claim seriously or to properly document an incident may result in personal liability for punitive damages.

Management and supervisor's responsibility upon notification of an incident is to:

- Intervene to stop the problem and/or behavior(s);
- Conduct an initial investigation of the situation;
- Seek the advice of legal counsel (contact the Police Employment Law Section, City Attorney's Office) if necessary;
- Reassure concerned individuals that the behavior will cease, and if it does not, to seek assistance immediately; and,
- Monitor the situation to ensure no reprisals, overtly or covertly, are taken against the person who complained. This should be done whether the complainant is a direct victim or only a reporting witness.

Managers and supervisors must engage in continuous monitoring of the workplace. Conducting a preliminary investigation in these situations often means making early inquiries to assess the severity of the problematic behavior(s), as well as assess reporting options. If in doubt, contact your Department resources for advice. Discriminatory actions and behaviors are misconduct, and these complaints shall be investigated in accordance with Department policy. It is the duty of Department managers, commanding officers, and supervisors to monitor the workplace to prevent retaliation from occurring; to identify and stop retaliation when it occurs; to take allegations of retaliation seriously; and to encourage employees to come forward without delay to report retaliation.

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Understanding Employment Law

Laws are generally created to outline principles and provide equal protections to everyone. This section describes key Federal and State laws governing equal employment opportunity and employment-based discrimination and documents the development of our country's anti-discrimination efforts.

Title VII or California Government Code Section 12940
It is illegal to block or impede an employee's right to be hired, retained, compensated or granted the various privileges and conditions of employment because he/she is a member of any protected class as outlined in Title VII or the CA Government Code.

Title VII describes certain forms of unlawful discrimination. The U.S. Supreme Court stated, "Title VII affords employees the right to work in an environment free from discriminatory intimidation, ridicule and insult" based on race, color, religion, sex, or national origin. Employers shall afford equal access and enjoyment of the privileges and benefits of employment to all members of these protected classes. "Equal access" under these federal provisions applies to recruiting, screening, interviewing and hiring employees, as well as promoting and providing employee benefits.

In judging whether an unlawful discrimination or harassment complaint is justified, the courts will generally use a legal interpretation called "the reasonable person" standard in determining if the conduct interferes with the claimant's work performance. This "interference" means that the offensive conduct made it more difficult for the complainant to do his/her job and that if another reasonable person under similar circumstances stepped into the complainant's shoes, he/she would agree that the conditions were impeding job performance and productivity.

Civil Rights Act of 1964
This Act was passed under President Johnson's administration. It established the Equal Employment Opportunity Commission (EEOC) as the agency that advises and assists persons and/or agencies with alleged violations of discrimination in employment. Enforcement of the federal regulation is assigned to the EEOC and the Department of Justice.

Age Discrimination in Employment Act of 1967
This Act prohibits employment discrimination against persons aged 40 and above. It was expanded in 1991 to include U.S. citizens working abroad for U.S. companies.

Rehabilitation Act of 1973
This Act, the precursor to the Americans with Disabilities Act of 1990, bans discrimination on the basis of disability by federal agencies or by programs receiving federal funds. This act helped persons with disabilities receive rehabilitation, obtain access to public buildings and enjoy equal employment opportunities.

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Americans with Disabilities Act of 1990
This Act, commonly referred to as the ADA, makes it illegal to discriminate against qualified individuals with disabilities. The purpose of the law was to provide the estimated 43 million persons with disabilities equal access to (a) employment opportunities, (b) programs, services, and activities provided by government entities and (c) reasonable accommodations to facilities open to the general public such as restaurants, hotels, shopping centers, police stations and businesses. The EEOC regulations provide employers with guidelines regarding how accommodations can be made, provides definitions and examples of covered disability descriptions, and delineates appropriate types of pre-employment inquiries.

Family and Medical Leave Act of 1993
This Act, commonly referred to as the FMLA, requires employers with 50 or more employees to provide eligible employees with up to 12 weeks of unpaid, job-protected leave for family and medical reasons. Examples include birth, adoption, or foster care needs of a child, providing care for a spouse, child, or parent with a serious health condition. Separate but related, the **Pregnancy Discrimination Act** extends the prohibition against sex discrimination and amends the Civil Rights Act of 1964 to add pregnancy, childbirth, and pregnancy-related medical conditions as protected against employment discrimination.

California Government Code Section 12940(a) and (q)
This Section outlines employment discrimination prohibitions. The state includes all of the protected classes listed in Title VII and extends protections based on ancestry, physical or mental disability, medical condition, and marital status.

Within the state of California, the 1959 **Fair Employment and Housing Act (FEHA)**, formerly called the Fair Employment Practice Act until 1980, prohibits all forms of employment discrimination as listed in the previous paragraph. In January 2000, sexual orientation was added to this statute. Sexual orientation is defined as meaning heterosexuality, homosexuality, and bisexuality. The FEHA's protections extend to actual, as well as perceived sexual orientation, and include persons who are discriminated against because of their association with a person who is of a particular sexual orientation or who is perceived to be of a particular sexual orientation. The Department of Fair Employment and Housing (DFEH) receives and investigates discrimination complaints filed with the State.

California Civil Rights Initiative
This Initiative, referred to as Proposition 209, now prohibits the use of race, sex, color, ethnicity, or national origin as criterion for either discriminating against or granting preferential treatment to any individual or group. Prop 209 does not invalidate any court order or consent decree in place.

Workplace conduct for **all** City employees is primarily governed by three documents, one from the City Council and the other two from the Office of the Mayor. **The Equal Employment Opportunity Policy**, adopted on November 26, 1975, and amended on

January 15, 1991, as well as the **Discrimination Free Workplace Policy**, adopted on February 12, 1992, and **Executive Directive No. 12**, issued on June 6, 2008, provide the guiding principles, policies and procedures for nondiscriminatory conduct by any City employee.

Additionally, there are separate discrimination prohibitions for a person suffering from AIDS (**LAMC 45.80**) or on the basis of sexual orientation (**LAMC 49.70**). Standards of conduct and proposed penalties for discriminatory violations are set out in the **Civil Service Commission's Disciplinary Guidelines Policy Section 33.2**. General information regarding employee protections, City policies and procedures for filing a complaint and recommended penalties for violations are available upon request from the EEO Section of the City's Personnel Department (see attached Resources and Referrals).

CONCLUSION

Departmental policies have evolved as EEO laws become more refined. Each policy statement serves as a directive regarding expectations and standards for the conduct of all Los Angeles Police Department employees to ensure the maintenance of a professional and discrimination free work environment.

This Bulletin cancels and supersedes Volume XLII, Issue 2, Anti-Discrimination and Retaliation, May 2012

Field Training Services Unit
Police Training and Education

DISTRIBUTION "A"

Attachments: Resources and Referrals
References

Resources and Referrals

Federal	Contact Information
Equal Employment Opportunity Commission (EEOC)	www.eeoc.gov (800) 669-4000
Office of Special Counsel Reporting Prohibited Personnel Practices	www.osc.gov
State	
Department of Fair Employment and Housing (DFEH)	www.dfeh.ca.gov (800) 884-1684 (213) 439-6799
City of Los Angeles	
Office of Discrimination Complaint Resolution	(213) 473-9123
Equal Opportunity Programs and EEO Compliance	myvoicela.org (213) 473-9100
Ethics Commission Whistleblower Hotline	www.ethics.lacity.org (800) 824-4825
Office of the City Attorney Dispute Resolution Program	www.lacityattorney.org (213) 978-1880
Los Angeles Police Department	
Behavioral Science Services	(213) 486-0790
Department Risk Manager (OCPP)	(213) 486-8730
Diversity, Equity, and Inclusion Officer, OCPP	www.lapdei.com (213) 486-5386
Risk Management Division Ombuds Section	(213) 486-8730 (213) 486-8127
Office of the Chief of Police	(213) 486-0150
Office of the Inspector General	(213) 893-6400
Professional Standards Bureau Internal Affairs Group	(213) 996-2772

References

29 U.S.C.	Equal Pay Act of 1963	§206(d)
	Age Discrimination Act of 1967	§621-34
	Rehabilitation Act of 1973	§791,793,794
	The Family & Medical Leave Act of 1993	§2601 et seq.
42 U.S.C.	Civil Rights Act of 1964	§2000e et seq.
	The Americans with Disabilities Act of 1990	§12101
	The Pregnancy Discrimination Act of 1978	§2000e(k)
	The Civil Rights Act of 1991	§1981 et seq.

California Peace Officers Association. (1998). Training Bulletin Service: Commonly Asked Questions about the Americans with Disability Act and Law Enforcement. Sacramento, CA: CPOA, Bulletin No. 5.

Rubin, P.N. (1995). Civil Rights and Criminal Justice: Employment Discrimination Overview. Research in Action. Washington DC: National Institute of Justice, Office of Justice Programs, NCJ 154278.

State of California. (1993). Discrimination is Against the Law. Sacramento, CA: Department of Fair and Equal Housing, DFEH-151 (12/93).

Los Angeles Police Department Policies.

Below is a listing of the pertinent Department policies and procedures in alphabetical order by topic heading.

Anti-discrimination Efforts Plan	Administrative Order No. 2, Jan 1999
Core Values	Department Manual
Discrimination Complaint Criteria; Reporting/Filing	Special Order No. 6, 2012
Employee Conduct	Department Manual
Equal Employment Opportunity Representatives	Department Manual
Grievance Procedure	Department Manual
Hazing and Initiation Activities	Department Manual
Motto of the Department	Department Manual
Mission Statement	Department Manual
Management Principles	Department Manual
Nondiscrimination Policy	Memorandum No. 5, May 1991
Policy Prohibiting Retaliation	Special Order No. 6, 2012
Prohibited Acts that Contribute to Retaliation	Department Manual
Relationship Between Department Employees	Department Manual
Sexual Harassment	Department Manual
Sexual Orientation Discrimination Policy	Department Manual

APPENDIX B

ERIC GARCETTI
MAYOR

EXECUTIVE DIRECTIVE NO. 34

Issue Date: March 30, 2022

Subject: Citywide Workplace Equity

The City of Los Angeles (City) is committed to an equitable workplace that rests on a foundation of values that define our City: principles founded on inclusion, empathy, and mutual respect. Not only are these values necessary for the City to recruit and retain employees who reflect and understand the diverse communities they serve, they are also key attributes for any City employee performing services for the public good. Throughout L.A.'s history, many policies have been developed by my predecessors to address these issues. In particular, the City of L.A. released a groundbreaking policy against HIV/AIDS discrimination, the first of its kind in the nation, and was the first city in California to protect its employees against LGBTQ discrimination, ahead of the state of California.

Now in order to strengthen the process and make it easier for employees to understand their duties and responsibilities and the procedures for addressing discrimination, harassment, hazing, and bullying, the City has brought all of these protections together to develop a single, easy to read and comprehensive, citywide policy that addresses all types of harassment and discrimination. The new Workplace Equity Policy is designed to be the foundation for a workplace rooted in respect, equity, and constructive methods of conflict resolution and incorporates feedback from employees, supervisors, and City leaders.

Since 2018, the City has taken various steps to increase equity in our workplaces. I signed Executive Directive 23: Harassment and Discrimination, which outlined the ways the City would become a more inclusive and equitable workplace. Since then, the City has come together to develop a series of over 50 recommendations to more effectively address and prevent incidents of harassment and discrimination in the workplace. My office partnered with the Information Technology Agency and the Personnel Department to develop a reporting and case management system known as MyVoiceLA. MyVoiceLA was designed to encourage reporting and ensure fair, thorough, and timely investigations of all reported incidents of discrimination and harassment.

In 2020, we confronted a legacy of racial injustice and took a substantive step to advance racial equity across City government. I signed Executive Directive 27: Racial Equity in City Government to translate our values into action within our own City government — assigning Racial Equity Officers in every department and mandating implicit bias training for all City employees and commissioners.

Executive Directive 34: Citywide Workplace Equity Policy is the next step along the path towards more equitable City workplaces, as it formalizes the reimagining of the City's Equal Employment Opportunity Program. This includes a realignment and expansion of the Personnel Department's Equal Employment Opportunity Division; a new Workplace Equity Policy; new Workplace Equity Complaint Procedures; a new Equity Review Panel; and citywide training designed to help each and every employee understand their rights and responsibilities under the Policy, as well as their role in contributing to the City's equitable and inclusive work environment.

Accordingly, I hereby direct the following:

Establishment of the Office of Workplace Equity

The Office of Workplace Equity shall be hereby established to provide subject matter expertise and lead in matters of equity and inclusion for City of Los Angeles employees and others who perform work for the City, through the following responsibilities:

- Supporting diversity, equity, inclusion, and belonging efforts citywide by developing and recommending new policies and procedures; partnering with departments to advise and assist their diversity, equity, inclusion and belonging efforts; and developing and sourcing training programs that instruct and inspire new ways of working more inclusively and equitably.
- Providing guidance, support, and proactive assistance to City departments in matters affecting diversity, equity and inclusion of City employees, applicants and volunteers.
- Developing and implementing a Citywide Culture and Climate Assessment and providing results and recommendations to each department.
- Developing a Citywide Inclusion and Anti-Bias Plan, engagement strategy, and curriculum of culturally responsive programs based on the results of the Citywide Culture and Climate Assessment.

Implementation of the Citywide Workplace Equity Policy and Workplace Equity Complaint Procedures

The Personnel Department has crafted a comprehensive Workplace Equity Policy to combine and update the City's various policies regarding workplace conduct. The City's Workplace Equity Policy will be applicable to all City employees and other persons identified within the Policy.

- The Policy outlines the City's commitment to a diverse and inclusive work environment, as well as equitable and civil workplace standards of conduct.

- This comprehensive policy will be adopted as the City's official policy on these matters as it updates existing prohibitions against conduct including discrimination, harassment, sexual harassment, bystander harassment and retaliation, and establishes a new prohibition against inequitable conduct.
- The Policy includes a requirement that all City supervisors report potential violations of the Workplace Equity Policy to MyVoiceLA.
- The Workplace Equity Complaint Procedures shall replace the Personnel Department's Discrimination Complaint Procedures, which are hereby rescinded. The Workplace Equity Complaint Procedures shall be updated, as appropriate, by the General Manager of the Personnel Department in collaboration with the Mayor's Office and the office of the CAO to reflect current procedures, best practices and legal requirements.
- Under the new Citywide Workplace Equity Complaint Procedures, the Equal Employment Opportunity Division shall implement an Equity Review Panel pilot program with the goal of expanding it for citywide use. The Equity Review Panel shall review all completed investigations of Equity Complaints to determine their thoroughness, completeness and accuracy, and shall use this determination to recommend appropriate responsive actions to department leadership.

All departments are required to ensure compliance with the Workplace Equity Policy and Workplace Equity Complaint Procedures and any updates. The Personnel Department shall offer training to help City employees understand their rights and responsibilities under the Policy. This training is mandatory for all City employees and other persons identified in the Policy and will be conducted biennially in conjunction with the City's mandatory sexual harassment prevention training.

Nothing in the Workplace Equity Policy is intended to abridge any rights or protections conferred upon sworn public safety officers under the Public Safety Officers Procedural Bill of Rights Act, the Firefighters Procedural Bill of Rights Act, or the California Constitution.

Equal Employment Opportunity Division shall investigate all City workplace equity policy violations.

The Equal Employment Opportunity (EEO) Division in the Personnel Department shall conduct investigations of internal workplace equity complaints or notifications of potential Workplace Equity Policy violations received through MyVoiceLA or other means. The Office of Discrimination Complaint Resolution (ODCR) and any of its associated processes are hereby dissolved. The EEO Division shall use the Workplace Equity Complaint Procedures as its guiding document for receiving, assigning, investigating, and responding to workplace equity complaints.

The EEO Division shall continue to respond to workplace equity complaints made by City employees to external agencies, such as the U.S. Equal Employment Opportunity Commission or the California Department of Fair Employment and Housing.

Department Heads shall make all reasonable efforts to ensure their departments are free of discrimination, retaliation, harassment, and other inequitable behaviors.

As such, each department head shall:

- Cooperate with the Office of Workplace Equity and EEO Division and its initiatives, including but not limited to, the implementation of the Workplace Equity Policy and Workplace Equity Complaint Procedures and participation in the Citywide Culture and Climate Assessment.
- Take prompt action to appropriately address violations of the Workplace Equity Policy.
- Cultivate environments that encourage reporting of violations of the Workplace Equity Policy.
- Ensure that supervisors report violations of this Workplace Equity Policy by taking appropriate action (counseling, retraining, or discipline) in the event of any supervisor who fails to report policy violations.
- Support equity investigations by:
  - Directing employees who are identified by the Office of Workplace Equity as reporting parties, named parties, or witnesses to participate in investigative interviews;
  - Promptly providing all requested documentation and information;
  - Accommodating requests from the EEO Division to meet with and interview involved parties on City time
- Post a copy of this policy in person and/or online, and any other key documents shared by the EEO Division, in a location where employees traditionally find key information about job duties and workplace rights or responsibilities.
- Maintain standard protocols for investigating and responding to non-Equity complaints referred by the EEO Division to the department for investigation and response.
- Maintain each of the following roles in their department, under the new titles reflected below:

Prior	New
Equal Employment Opportunity Coordinator	Workplace Equity Officer
Sexual Orientation Counselor	LGBTQ+ Support Officer
Reasonable Accommodation Coordinator/Disability Coordinator	Reasonable Accommodation/Disability Support Officer
Sexual Harassment Counselor	Sexual Harassment Support Officer

Prior Executive Directives and related documents shall be continued or rescinded as follows:

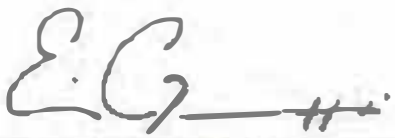
The following policies are considered complementary to the new Workplace Equity Policy and should be used in concert with it in relevant circumstances: Workplace Violence Policy and Guidelines, Domestic Violence and Abuse Policy, Domestic Violence Protocols, Workplace Gender Transition Guidelines, Reasonable Accommodation Policy, and the Lactation Accommodation Policy.

This Executive Directive will incorporate and supersede Executive Directive No. PE-1: Equal Employment Opportunity, Non-Discrimination and Reasonable Accommodations, (Revised), dated August 20, 2004, *except* as it relates to Reasonable Accommodations.

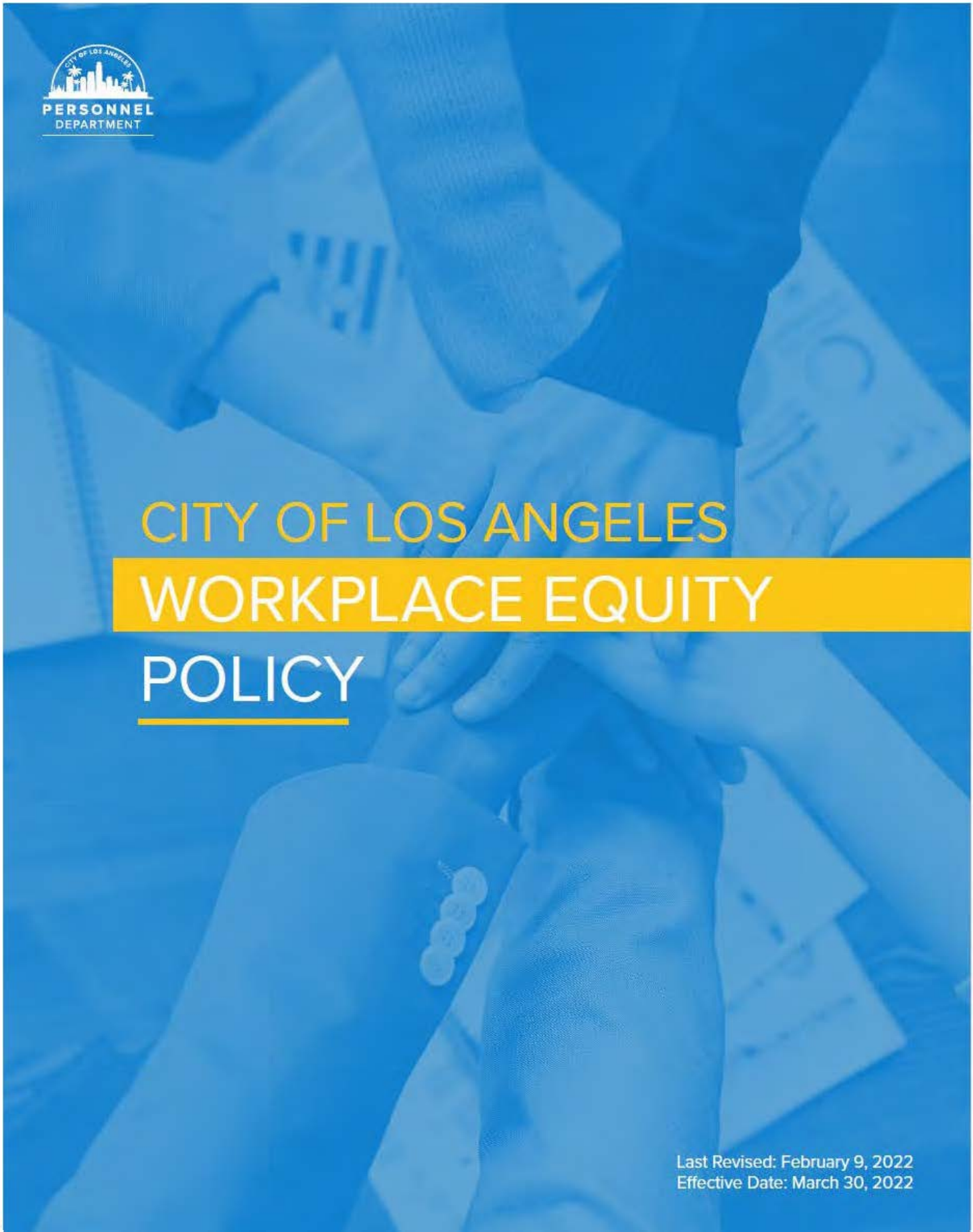
The following policies, procedures and directives were incorporated by reference into the new Workplace Equity Policy and are superseded by this Executive Directive, as are all other Personnel procedures and policies on the topics of harassment or discrimination:

- Executive Directive 8: Zero Tolerance for Hazing Fellow Employees, November 20, 2006
- Executive Directive 12: Policy Against Discrimination in Employment, June 6, 2008
- HIV and AIDS Discrimination in City Employment Policy
- Discrimination Complaint Procedure
- Sexual Harassment Complaint Procedure
- Sexual Orientation Complaint Procedure
- Hazing Complaint Procedure
- The Sexual Harassment Reporting Procedure Update, dated December 15, 2017

Executed this 30th day of March, 2022.



ERIC GARCETTI
Mayor


PERSONNEL
DEPARTMENT
CITY OF LOS ANGELES
WORKPLACE EQUITY
POLICY
Last Revised: February 9, 2022
Effective Date: March 30, 2022

CITY OF LOS ANGELES **WORKPLACE EQUITY POLICY**

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1. INTRODUCTION

STATEMENT OF VALUES

The City of Los Angeles (City) is steadfast in its mission to maintain a professional, equitable, and inclusive workplace to cultivate an environment where diverse employees and applicants experience equity of opportunity for personal and organizational success.

The City recognizes that a workforce of individuals with diverse personal backgrounds, ideas, talents, and experiences facilitates an opportunity for each individual to make a unique contribution to the workplace and to provide superior and equitable service to all of the communities of Los Angeles.

The City is committed to protecting the right of employees and applicants for employment to be free from unlawful, inequitable, and unprofessional treatment in the workplace.

CITY OF LOS ANGELES **WORKPLACE EQUITY POLICY**

PURPOSE

The City of Los Angeles Workplace Equity Policy (Policy) is established to preserve the dignity and professionalism of the workplace and to encourage equity within the diverse City workforce. This Policy consolidates existing City policies and documents outlining expectations of behavior and standards of conduct pertaining to an equitable and civil workplace. This Policy also outlines key procedures for reporting and addressing prohibited conduct.

Nothing in this Policy is intended to abridge any rights or protections of public safety officers or firefighters that are conferred by the Public Safety Officers Procedural Bill of Rights Act, the Firefighters Procedural Bill of Rights Act, California Penal Code, Los Angeles City Charter, or any other statutes or ordinances.

POLICY

All City employees and other specified individuals covered by this Policy are expected to act and communicate with others in a manner that is appropriate for an equitable and inclusive working environment.

All City employees and other specified individuals covered by this Policy are responsible for understanding and conducting themselves in accordance with this Policy, as well as all applicable local, state, and federal laws.

2. SCOPE OF COVERAGE

2.1 WHO IS REQUIRED TO COMPLY WITH THIS POLICY

All City employeess (as defined in section 2.1.1) and any other individuals covered by this Policy, including, but not limited to City commissioners, neighborhood council board members, other volunteers, and fellows are responsible for understanding and abiding by this Policy.

2.1.1 DEFINITION OF "EMPLOYEE" UNDER THIS POLICY

For the purposes of this Policy, "employee" includes any individual employed within any City department, including proprietary departments, occupying a position in the classified civil service or working as an intern (whether paid or unpaid), a contract employee (a person providing services pursuant to a contract in the workplace), or as an employee exempted from civil service under the provisions of the City Charter (including, but not limited to, as an elected official or paid appointed official).

2.1.2 DEFINITION OF "SUPERVISOR" UNDER THIS POLICY

For the purposes of this Policy, "supervisor" includes any employee, having authority in the interest of the City to hire, transfer, suspend, lay off, recall, promote, discharge, assign, or discipline other employees, or having the responsibility to direct them, or to act on their grievances, or effectively to recommend these actions, if exercising this authority is not of a merely routine or clerical nature, but requires the use of independent judgment.

2.1.3. OTHER INDIVIDUALS COVERED BY THIS POLICY

Volunteers (e.g., neighborhood council board members, unpaid commissioners) and fellows are protected from Harassment, Sexual Harassment, Hazing, Bullying, and Inequitable Conduct, as defined in this Policy.

Job applicants are protected from Discrimination, Harassment, Bystander Harassment, Sexual Harassment, and Retaliation with regard to their application for employment with the City.

2.2 WHEN AND WHERE THIS POLICY APPLIES

This Policy prohibits Discrimination, Harassment, Bystander Harassment, Sexual Harassment, Retaliation, Inequitable Conduct, Hazing, Abusive Conduct and Bullying in the workplace, during working hours, and/or at work-related events. The City also reserves the right to take appropriate corrective action against potential Policy violations occurring in an environment or under circumstances with a nexus to the workplace. These environments or circumstances may include, *but are not limited to:*

- Before or after working hours (including during breaks)
- At work-related conferences
- At City sponsored volunteer activities, meetings or events
- At council, committee and commission meetings or events
- In "the field"
- Online (whether or not during working hours)
- At "off-duty" events when interacting with other City employees, contractors, and/or volunteers (including social events such as "happy hours," retirement parties, holiday celebrations, etc)

2.2 WHEN AND WHERE THIS POLICY APPLIES (Cont'd)

This Policy also prohibits employees from using any technology, communication system, or equipment, regardless of whether City-issued, personal, or otherwise, whether used online or offline, to deliver, display, store, forward, publish, circulate, or solicit material in violation of this Policy. The technology, communication systems, or equipment referenced in this subsection include, *but are not limited to*, email, text, social media, internet, intranet, telephones, computers, fax machines, voicemail, radio, video, cell phones, mobile digital terminals, and/or other communication devices.

2.3 CONSEQUENCES FOR VIOLATION OF THIS POLICY

All individuals covered by this Policy are responsible for understanding and conducting themselves in accordance with this Policy and its related Workplace Equity Complaint Procedures. Failure to do so will result in prompt and appropriate responsive administrative action which may include, but is not limited to, counseling, education and training, oral or written warnings, written reprimands, suspension, demotion, discharge, or removal (e.g. Policies of the Personnel Department, Section 33.2).

For public safety officers or firefighters, investigation of and discipline for violation of this Policy will be subject to procedures established under the City Charter (including, but not limited to Board of Rights procedures), relevant MOUs, and California state law (including, but not limited to rights established under the Public Safety Officers Procedural Bill of Rights Act and the Firefighters Procedural Bill of Rights Act).

3. EQUITABLE WORKPLACE

3.1 EQUITABLE WORKPLACE STANDARDS

City Policy prohibits harassment or discrimination on the basis of any Protected Category, or sexual harassment, retaliation, and other inappropriate conduct based on a Protected Category or protected activity. These activities interfere with the City's goals of maintaining a diverse, equitable, inclusive, and productive workplace.

Protected Categories under this Policy include:

- Acquired Immune Deficiency Syndrome (AIDS) or the Human Immunodeficiency Virus (HIV) Status
- Age (40 and over)
- Ancestry
- Color
- Disability - Mental or Physical
- Domestic Violence Victim Status
- Ethnicity
- Gender, Gender Expression and/or Gender Identity
- Genetic Information (including family medical history)
- Marital Status
- Medical Condition (cancer and genetic characteristics)
- Military and Veteran Status
- National Origin (including but not limited to language use restrictions)
- Race (including natural hair texture and/or protective hairstyles)
- Religious Creed (including but not limited to religious dress and grooming practices)
- Sex (including but not limited to pregnancy, childbirth, breastfeeding, and related medical conditions)
- Sexual Orientation
- Any Protected Category under local, state (California), or federal law

This Policy also includes protections for individuals perceived as being a member of one of the Protected Categories and individuals associated with members of the Protected Categories.

The City prohibits conduct in violation of this Policy and will respond promptly and effectively to reports of potential Policy violations. This response includes action to stop, prevent, correct, and where appropriate, discipline any individual who engages in any conduct that violates this Policy.

The definitions of conduct prohibited by this Policy may be different than those used in legal proceedings in courts of law. Consequently, no legal conclusions can or should be drawn from decisions associated with this Policy and its related administrative procedures.

CITY OF LOS ANGELES WORKPLACE EQUITY POLICY

3.2 CONDUCT PROHIBITED UNDER THIS POLICY

3.2.1 DISCRIMINATION

For the purposes of this Policy, discrimination is the unequal treatment of one or more employees or applicants in any aspect of hiring or employment because of the employee(s') actual or perceived Protected Category(ies).

Discrimination may include, *but is not limited to*, one or more instances of the following:

- Granting or withholding promotional opportunities because of an employee's race, disability, sexual orientation, etc.
- Recommending or instituting discipline against one or more employees because of their religion, national origin, age, etc.
- Declining to hire an applicant because of their sex, marital status, veteran status, etc.
- Requiring different work appearance, dress, and grooming standards based on sex, gender and/or gender identity, gender expression, religious beliefs, etc.
- Making employment decisions about any individual on the basis of their natural hair texture or wearing protective styles such as braids, locs, twists, and knots
- Requiring an employee or applicant for employment to take an HIV test, or any other test intended to assess directly or indirectly a person's infection with HIV, unless specifically required by a controlling law

3.2.2 HARASSMENT

For the purposes of this Policy, harassment is the unwelcome and offensive, threatening, or abusive treatment of one or more employees or other individuals covered by this Policy by any individual, including both City employees and third parties, because of their actual or perceived Protected Category(ies).

Harassment may include, *but is not limited to*, one or more instances of the following:

- Posting, sending, forwarding, soliciting, or displaying in the workplace any offensive materials, documents, or images that are or could reasonably be perceived as racist, sexist, ableist, ageist, or as targeting any protected group
- Using epithets, slurs, or degrading words or names related to a Protected Category
- Making jokes related to a Protected Category
- Making comments or gestures about a person's physical appearance that have a racial, gender-related, disability-related, religious, age-related, or ethnic connotation
- Making derogatory comments about religious differences and practices
- Offensive or unwelcome conduct or comments targeted at one or more employees because of their Protected Category, even if the content is not about their Protected Category

CITY OF LOS ANGELES WORKPLACE EQUITY POLICY

3.2.3 SEXUAL HARASSMENT

For the purposes of this Policy, sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical conduct of a sexual nature by any individual, including both City employees and third parties, that meets any one of the following criteria:

- Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; or
- Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual or others; or
- Such conduct could reasonably interfere with the performance of work or create an offensive, intimidating, or abusive working environment.

Sexual harassment may include, *but is not limited to*, one or more instances of the following:

- Unwelcome romantic or sexual advances, flirtation, teasing, sexually suggestive or obscene letters, invitations, comments, questions, notes, emails, voicemails, or gifts directed toward another employee (including those initiated between employees engaged in a current or former romantic relationship)
- Making sex-, gender-, or sexual orientation-related comments, slurs, jokes, remarks, or epithets
- Leering, sexual, obscene, or vulgar gestures
- Displaying or distributing sexually suggestive or derogatory objects, pictures, cartoons, or posters
- Impeding or blocking movement, unwelcome touching, or assaulting others
- Reprisals or threats after a rejection of sexual advances
- Treating an employee(s) favorably because of sexual or romantic conduct

3.2.4 BYSTANDER HARASSMENT

For the purposes of this Policy, bystander harassment occurs when an employee or other individual covered by this Policy witnesses an incident of unwelcome and offensive, threatening, or abusive conduct, even if the individual engaging in the conduct is unaware of this "bystander" employee's presence. When an individual (whether a City employee or third party) engages in harassing behavior, they assume the risk that a "bystander employee" may witness the behavior. The City considers bystander harassment as being the same as direct harassment of an employee.

Bystander harassment may include, *but is not limited to*, the following conduct:

- Making jokes or comments related to a Protected Category (such as one or more disparaging comments about individuals of a different sex), which are overheard by another employee
- Sending an email containing offensive materials to a trusted colleague, which is inadvertently forwarded to or witnessed by another employee
- Engaging in one or more acts of physical contact in the workplace that is/are sexual in nature and is/are witnessed by another employee

CITY OF LOS ANGELES WORKPLACE EQUITY POLICY

3.2.5 RETALIATION

For the purposes of this Policy, retaliation is any adverse employment action or conduct taken against one or more employees or other individuals covered by this Policy because the employee(s) or individual(s) engaged in any activity protected under this Policy.

"Protected activities" under this Policy include, *but are not limited to*:

- Reporting or assisting in reporting suspected violations of this Policy
- Cooperating in investigations or proceedings arising out of any alleged violation of this Policy
- Requesting or receiving a reasonable accommodation for a medical condition or disability, such as medical leave
- Reasonably and in good faith indicating opposition, or taking actions to, oppose discrimination or harassment
- Any other kind of opposition to inequitable conduct in the workplace, whether formal or informal

Examples of adverse employment actions or conduct may include, *but are not limited to*:

- Conduct or behavior that could reasonably interfere with an individual or individuals' terms and conditions of employment
- Conduct or behavior that has the effect of creating an intimidating, hostile, offensive, or abusive working environment for the individual or others
- Non-selection for training, promotion, or other coveted position
- Discipline, reprimands, loss of pay, transfer, demotion, reassignment, or termination

3.2.6 INEQUITABLE CONDUCT

By way of this subsection, it is the City's intent to identify, address, and prevent misconduct at the lowest possible level.

Inequitable Conduct is any inappropriate conduct based on a Protected Category or protected activity. Inequitable Conduct includes any instance of unwelcome conduct directed at one or more employees or other individuals covered by this policy, because of the employee(s)' or other individual(s) covered by this Policy's actual or perceived Protected Category(ies) or protected activity(ies). Similarly unwelcome conduct that is sexual in nature may also violate this Policy.

Inequitable Conduct may be similar in nature to conduct defined as discrimination, harassment, sexual harassment, and retaliation under this Policy, although to be considered Inequitable Conduct, it must be lesser in severity.

Inequitable Conduct may include, *but is not limited to*, one or more instances of the following, depending on the context in which it occurs:

- Microaggressions (indirect, subtle or unintentional verbal or behavioral conduct that communicates hostile, derogatory, or negative attitudes toward Protected Categories)
- Stray remarks
- Hostilities in vocal tone and body language
- Sexual innuendo

CITY OF LOS ANGELES **WORKPLACE EQUITY POLICY**

4. CIVIL WORKPLACE

4.1 CIVIL WORKPLACE STANDARDS

Certain behaviors, including hazing, abusive conduct, bullying, and other types of discourteous and unprofessional conduct interfere with the City's goals of fostering a civil, safe, professional, and productive work environment. The City prohibits such conduct and will respond promptly and effectively to reports of potential Policy violations. This includes action to stop, prevent, correct, and when appropriate, discipline any conduct that violates this Policy.

4.2 PROHIBITED CONDUCT

4.2.1 HAZING

Hazing is any action taken, or situation created, that is meant to (or in some cases may unintentionally) cause embarrassment, degradation, discomfort, or ridicule, and that may cause emotional and/or physical harm to an individual or individuals. Hazing typically occurs as a rite of passage or involves peer pressure. Actions may be considered hazing, regardless of an individual's willingness to participate in such activities.

Hazing consists of a broad range of potentially harmful behaviors or activities that show disregard for another person's dignity or well-being. Hazing often involves engaging in illegal, harmful, demeaning, or dangerous acts that are not consistent with City policy and the performance of job-related activities. Even when these behaviors do not appear overtly harmful (i.e., where the participants appear to engage in them willingly), they may constitute hazing if they might cause humiliation or be perceived as demeaning or degrading. The determination of whether any particular conduct constitutes hazing will depend on the circumstances and context in which that activity occurs. Hazing activities or behaviors do not have to be related to any Protected Category to violate this Policy.

For the purposes of this Policy, hazing may include *but is not limited to*:

- Unnecessary physical and/or psychological shocks
- Forced, unnecessary exertions
- Engaging in pranks or horseplay
- Requiring employees to engage in stunts or buffoonery
- Degrading or humiliating games and activities
- The inappropriate application of substances to the body of another (including forced eating or drinking)

4.2.2 ABUSIVE CONDUCT/BULLYING

For the purposes of this Policy:

Abusive Conduct is verbal, physical, electronic, or other behavior by a supervisor, directed at one or more subordinates that demeans, intimidates, or humiliates or could reasonably be considered hostile, offensive, and unrelated to a legitimate business interest of the workplace.

4.2.2 ABUSIVE CONDUCT/BULLYING (Cont'd)

> **Bullying** is verbal, physical, electronic, or other behavior directed at one or more employees or other individuals covered by this Policy) that demeans, intimidates, or humiliates or could reasonably be considered hostile, offensive, and unrelated to a legitimate business interest of the workplace.

Abusive conduct and bullying consist of a broad range of behaviors, which may be subtle or overt. In most circumstances, abusive conduct or bullying consists of repeated or multiple incidents, over a period of time. *The determination of whether a particular act constitutes abusive conduct or bullying will depend on the circumstances and context in which that act occurs.*

Abusive Conduct and/or Bullying can take the form of:

- Inappropriately directing profanity or shouting at another person
- Criticizing a person, their opinions, or actions persistently, with malice, or without a legitimate business reason
- Belittling a person's opinions persistently, especially in the presence of others
- Deliberately sabotaging or impeding a person's work
- Tampering with a person's work equipment or personal belongings without legitimate reason
- Spreading malicious rumors, gossip, or innuendo
- Sending via email or text, posting, or sharing online any objectively negative, harmful, false, or derogatory content about someone else, including the sharing of personal or private information about someone else and thereby causing embarrassment or humiliation
- Excluding or isolating someone consistently
- Intruding on a person's privacy by spying or unreasonably pestering

A single incident of bullying may constitute a violation of this Policy where it interferes with the performance of work, or creates a working environment unfavorable to productive work.

Conduct that reflects a supervisor engaging in reasonable and appropriate behavior to monitor, direct, evaluate, or hold an employee accountable to their duties is not prohibited by this subsection.

Note: Employees or other individuals covered by this Policy who make threats or engage in confrontational behavior, possess and/or use weapons (without authorization) on City property or on the job, or engage in actions on the job or on City property intended to destroy property or to inflict bodily injury represent a potential Workplace Violence threat. Such behavior must be brought to the attention of a supervisor and/or the employing department's Workplace Violence Coordinator, and/or to the City's Threat Assessment Team. Refer to the City's Workplace Violence Policy for guidance in handling these matters.

5. REPORTING POTENTIAL POLICY VIOLATIONS

Any City employee or other individual covered by this Policy (as defined in section 2.1 of this Policy) who believes they have been subjected to or learns of conduct that potentially violates this Policy has the right to, and is encouraged to, without interference, report the potential violation of the Policy to any of the following:

- Online at **MyVoiceLA.org**
- To a City supervisor (as defined in section 2.1.2 of this Policy)
- To a departmental Workplace Equity Officer, Sexual Harassment Counselor, LGBTQ+ Counselor, Disability Specialist, or Human Resources (HR) representative
- To the Personnel Department - Office of Workplace Equity

Employees may also report to any external non-discrimination enforcement agency, such as the **California Department of Fair Employment and Housing (www.dfeh.ca.gov)** or the federal **Equal Employment Opportunity Commission (www.eeoc.gov)**.

Any City employee has the right to report any potential violation(s) of this Policy – even if they were not the primary 'target' of the potential violation(s) – if they witnessed the potential violation(s) or have reason to believe that a potential violation has occurred.

City employees are not required to confront the person alleged to have violated the Policy before filing a report on the potential violation of the Policy.

5.1 RIGHT TO REPORT ANONYMOUSLY

Any City employee may report potential Policy violations anonymously unless the employee is a supervisor reporting an incident as part of their supervisory duties. A reporting party's anonymity will be protected to the greatest extent possible; in some cases investigations of anonymous reports may result in investigative staff, or other involved parties, becoming aware of the identity of the reporting party.

5.2 RIGHT TO REPORT IRRESPECTIVE OF INCIDENT DATE

Under this Policy, incidents may be reported regardless of how much time has passed since the incident and will be investigated to the greatest extent possible. Supervisors reporting as part of their job duties should report in a timely manner, as outlined below.

5.3 CONFIDENTIALITY OF INVESTIGATIONS

Equity complaints and related documents are confidential personnel records and will be accorded the strictest confidentiality possible. Such confidential records and information shall be maintained, secured, and released only as permitted by law.

6. DUTIES & OBLIGATIONS UNDER THIS POLICY

6.1 SUPERVISOR DUTY TO REPORT POTENTIAL POLICY VIOLATIONS

All City supervisors have a ***duty*** to report potential violations of the Workplace Equity Policy through **MyVoiceLA.org**. Supervisors are responsible for knowing how to report according to the City's Workplace Equity Complaint Procedures. When submitting a report through MyVoiceLA.org on behalf of another employee, supervisors must:

- Include approximate date(s) and description(s) of the potential Workplace Equity Policy violation(s);
- Identify key involved parties and witnesses;
- Detail any responsive action taken by the supervisor; and
- identify themselves, their department and contact information.

6.1.1 TIMEFRAME FOR SUPERVISOR REPORTING

Supervisors must report any potential Policy violation ***as soon as practically possible***, (usually within 48 hours of being notified of the potential Policy violation).

6.1.2 SCOPE OF SUPERVISORY DUTY TO REPORT

Supervisors must report ***any and all potential Policy violations*** they become aware of. Supervisors shall not discourage or refuse to accept reports of violations of this Policy for any reason, nor may supervisors decline to report as required by this Policy – even when the reporting party requests that no action be taken, or where the supervisor does not personally regard the report as reasonable, timely, significant, or true. Supervisors are also required to fulfill their reporting duties regardless of whether any of the parties involved are direct subordinates of the supervisor or in the supervisor's chain of command.

Failure by any supervisor to carry out these duties may be cause for discipline. For this reason, it is recommended that any supervisor who is unsure whether a Policy violation has occurred report the incident through the City's Workplace Equity Complaint Procedures.

6.2 SUPERVISOR DUTY TO PREVENT AND STOP VIOLATIONS

All City supervisors have a duty to maintain an equitable workplace (free from harassment, discrimination, retaliation etc.). To fulfill this duty, supervisors must take appropriate action to prevent and stop any harassment, discrimination, retaliation, and inequitable conduct in the workplace. Supervisors should consult with their management and/or human resources staff to ensure compliance with this Policy.

Supervisors may also seek advice from the Office of Workplace Equity on reporting and/or addressing potential Policy violations.

6.3 EMPLOYEE DUTY TO COOPERATE IN EQUITY INVESTIGATIONS

All City employees and other individuals covered by this Policy have a duty to cooperate with Equity Investigations. Failure to cooperate in an Equity Investigation may result in disciplinary action, subject to limited exceptions.

Appendix C

C. **Harassment** includes conduct that has the purpose or effect of substantially interfering with the work performance of an employee or creating an intimidating, hostile, or offensive work environment. Harassment includes, but is not limited to, offensive statements, gestures, or physical contact; graffiti or offensive written materials; using Department communication systems and computers to send or receive offensive statements, graffiti, pictures, or other offensive materials; and other methods of creating a hostile work environment. The City and the Department prohibit all forms of harassment, including sexual harassment..

D. **The EEO policies of the City and the Department are more comprehensive than state or federal law. Conduct that does not violate state or federal law may violate these policies** and may subject an employee to discipline, up to and including discharge. Therefore, conduct that violates this policy may, or may not, also violate federal or state law, and a finding that an employee has violated this policy is not necessarily a finding that the employee also violated state or federal law.

NOTE: *The City and the Department will take immediate and appropriate corrective action when it determines that a violation has occurred. Due to the sensitive nature, all complaints will be investigated with care, and the privacy of the complaining person and the person accused of harassment will be respected to the extent possible*. The penalties for violating these equal employment opportunity policies may include suspension and termination.

IV. EQUAL EMPLOYMENT OPPORTUNITY COMPLAINTS

A. External Complaints of Employment Discrimination

Discrimination on the basis of protected class status is prohibited by federal and state law, as well as the Municipal Code of Chicago. These statutes and ordinance have established investigative agencies which receive complaints of discrimination, conduct investigations, and bring enforcement actions. Department employees *and employees of third-party contractors working at Department facilities* are entitled to bring complaints of employment discrimination to such agencies, to bring internal complaints within the Department as described in Item III-B, or both. No provision of this directive shall be construed to prevent any Department member from seeking legal remedy outside the Department.

1. The Equal Employment Opportunity Commission (EEOC) is responsible for receiving, mediating, and investigating charges of employment discrimination brought under various federal anti-discrimination statutes.

2. The Illinois Department of Human Rights (IDHR), a state agency, is responsible for receiving and investigating complaints of employment discrimination under the Illinois Human Rights Act. The Illinois Human Rights Act includes a section prohibiting employment discrimination. If the IDHR finds that there is substantial evidence to support a claim of employment discrimination under the Act, the matter then can be filed with the Illinois Human Rights Commission for a full hearing on the merits.

3. The Chicago Commission on Human Relations (CCHR) is included in a section of the Chicago Human Rights Ordinance. The CCHR is the city agency responsible for receiving and investigating complaints of employment discrimination.

4. The Cook County Commission on Human Rights (CCCHR) is the county agency responsible for receiving and investigating complaints of employment discrimination. The Cook County Human Rights Ordinance also includes a section prohibiting employment discrimination.

B. Internal Complaints of Employment Discrimination

1. A Department member *or employee of a third-party contractor working at a Department facility* who believes that he or she has been the victim of employment discrimination may bring a complaint to any of the following Department members or offices:

a. any CPD supervisor, sworn or civilian;

NOTE: For EEO complaints, Department members *and employees of third-party contractors working at Department facilities* need not first report the complaint to their immediate supervisor delineated in the Department directive entitled "Complaint and Disciplinary Procedures."

b. the *Civilian Office of Police Accountability (COPA)*;

c. the Office of Legal Affairs (OLA); or

d. the Bureau of Internal Affairs (BIA).

NOTE: When reporting complaints directly to any supervisor or the Office of Legal Affairs, the complainant will immediately provide a written summary of the alleged incident.

2. The supervisor who first receives the EEO complaint will:

a. initiate the complaint disciplinary process and obtain a Complaint Register (CR) number for all employment discrimination complaints, including, but not limited to, incidents of harassment that come to his or her attention, whether or not a complaint has previously been reported or filed with them;

b. call *COPA* to report the complaint. Inform the *COPA* call-taker that the subject complaint is an EEO complaint;

c. record the CR number assigned to the matter by the *COPA* call-taker on the initiation To-From-Subject report, which is submitted to *COPA*. Submit a photocopy of this To-From-Subject report to the Office of Legal Affairs, directed to the attention of the EEO Officer; and

d. obtain a complaint log number from *COPA* and specify that it should not be converted into a CR number until the identity of the complainant is ascertained **if the EEO complaint is anonymous.**

NOTE: Any supervisor receiving complaints subsequent to an already initiated CR number will contact *COPA* and prepare a To-From-Subject report using the original CR number and EEO complaint number. This report will only contain information relative to the new allegation. Copies of this report will be forwarded as follows: original to *COPA*, one copy to BIA, and one copy to the Office of Legal Affairs.

3. The *Civilian Office of Police Accountability* will follow the normal and customary procedures associated with the registering of a complaint.

4. The Bureau of Internal Affairs

a. The Bureau of Internal Affairs (BIA) has primary responsibility for conducting a prompt and thorough investigation of complaints of employment discrimination.

b. In addition, BIA will also cooperate with OLA in monitoring pending investigations. If an exempt member (or designee) assigned to the Bureau of Internal Affairs determines that immediate action should be taken during the pendency of the investigation to prevent further discrimination, retaliation, or allegations, he or she will forward that information to OLA for further consideration and response. These actions can include, but are not limited to, appropriate changes in assignments, details, or other nondisciplinary measures.

NOTE: BIA may refer an investigation to another unit of the Department after consultation with the EEO Officer. The decision to refer a complaint for investigation by another division of the Department must take into account the nature of the complaint, the relationship of the complainant to the accused, and other relevant information.

5. The Office of Legal Affairs

The Office of Legal Affairs (OLA) is responsible for coordinating and monitoring EEO policy, assisting in the investigation, defense of external EEO investigations, and defense of external EEO litigation. In particular, OLA will be responsible for:

a. designating one or more persons to act as EEO officers with the responsibility of assigning an EEO Complaint Number to each reported complaint.

b. receiving and reviewing copies of all complaints of employment discrimination that are filed directly with OLA. Copies of all complaints filed directly with OLA will be forwarded to *COPA* so that a Complaint Register investigation may be opened and a EEO Complaint form prepared.

c. monitoring Complaint Register investigations by BIA (or the designated referral unit) and considering whether any immediate action should be recommended during the pendency of the investigation to prevent further discrimination, harassment, retaliation, or allegations. These recommendations can include, but are not limited to, appropriate changes in assignments, details, or other non-disciplinary measures. If the EEO officer determines that some action is appropriate, that recommendation will be forwarded to the commanding officer of OLA and the General Counsel to the Superintendent.

d. recommending, with the assistance and cooperation of other appropriate units of the Department, training on the provisions and enforcement of the Department's EEO policy and this directive. OLA also has the authority to consider and recommend other non-investigative methods to increase awareness of the EEO policy and this directive to improve enforcement and compliance.

e. monitoring all external complaints and charges of employment discrimination and promptly forwarding such complaints to the City's Department of Law. The EEO officer will assign an EEO complaint number if a number has not already been assigned. When appropriate, OLA may request that a Complaint Register investigation commence or be reopened upon receipt of an external complaint of employment discrimination. Whether or not an internal investigation is conducted in these circumstances, OLA will monitor the external investigation and recommend action (e.g., reassignment, training), where appropriate.

f. tracking all internal and external EEO complaints and related complaint register investigations.

g. evaluating and implementing any action necessary to address EEO complaints filed anonymously.

h. preparing an annual summary of the EEO complaints filed, complete with a description of the complaint register investigation status of these cases.

i. ensuring that an EEO and Complaint Log number is obtained for allegations of discrimination, harassment, or retaliation, in conjunction with the following:

NOTE: Make sure that the Complaint Log number is not converted to a Complaint Register (CR) number.

(1) the Department fails to hire an applicant;

(2) the Department fails to promote a member;

(3) the Department requires the resignation of any member who attains the age of 63;

(4) the Department imposes discipline on a member and that discipline is served;

(5) the subject matter that is the basis of the allegation is the subject of a pending or resolved case filed at the Chicago Police Board; or

(6) the Department discharges a probationary member and, that discharge is already effective.

NOTE: It is the responsibility of the EEO officer to investigate the above allegations and to ascertain the appropriate course of action to be taken by the Department.

V. MANAGEMENT AND LABOR AFFAIRS SECTION

Whenever a grievance is filed in which the Department member alleges a violation of the City or Department Equal Employment Opportunity policies, the Management and Labor Affairs Section will promptly forward a copy of the grievance to OLA. OLA will determine if, in addition to being handled as a grievance under the applicable collective bargaining agreement, any other action should be taken pursuant to this directive. This may include opening an EEO file, a Complaint Register investigation, or other appropriate response.

VI. RECORDS RETENTION

A. Reports or other information relative to a discrimination complaint will not be placed in the complainant member's personnel file.

B. The Office of Legal Affairs will maintain EEO investigative files for a period of ten years after resolution of the complaint or longer if subject to pending litigation.

(Items indicated by *italic/double underline* were added or revised).

Authenticated by KC

17-080 JAB

Eddie T. Johnson
Superintendent of Police

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Appendix D

SCOPE (continued)

c. Policy that has a disproportionate impact on a group specifically protected by law, unless the policy is justified by business necessity

d. Failure to make a reasonable accommodation for or failure to timely engage in cooperative dialogue with individuals with disabilities, religious observances/practices, those who are pregnant, recovering from childbirth or a related medical condition, and victims of domestic violence, stalking and/or sexual offenses. An accommodation may not be required if such accommodation would impose undue hardship on the Department, but a cooperative dialogue must still occur

e. Discriminatory harassment, intimidation, ridicule and insults, including, but not limited to, using discourteous, disparaging or disrespectful remarks

f. Retaliation and/or harassment against an employee, applicant and any non-employee who is a contractor, subcontractor, vendor, consultant, freelancer or other person providing services pursuant to a contract in the workplace or an employee of the same, for filing a discrimination complaint, participating in an investigation of a complaint, commencing a civil action based on unlawful discrimination or requesting a reasonable accommodation.

All forms of employment discrimination, including retaliation, are **PROHIBITED** both in the actual workplace and in any location that can be reasonably regarded as an extension of the workplace, such as an off-site Department sanctioned social function.

Employees and applicants should file a complaint with the OEEO at the earliest opportunity if the employee or applicant believes that a uniformed or civilian supervisor, manager or any other employee has engaged in any of the conduct described above.

NOTE *A complaint made in good faith will not be considered a false accusation. Knowingly making a false accusation of discrimination or knowingly providing false information during the course of an investigation of a complaint may be grounds for discipline.*

At least one or more trained EEO Liaisons must be designated in every command throughout the Department to provide assistance to complainants, witnesses and others regarding any EEO matter. EEO Liaisons are non-supervisory members of the service who serve voluntarily with the recommendation of their Commanding Officer and approval of the OEEO. For further information about the EEO Liaison Network, contact the Program Coordinator at [redacted].

DEFINITIONS

EMPLOYMENT DISCRIMINATION – Disparate treatment of employees or applicants regarding any terms, conditions or privileges of employment, including hiring, assignments, working conditions, salary and benefits, evaluations, promotions, training, transfers, discipline and termination based on actual or perceived status of a person's race, color, national origin, alienage or citizenship status, religion or creed, gender (including gender identity), sexual and reproductive health decisions (e.g., fertility-related medical procedures, sexually transmitted disease prevention, testing and treatment, family planning services and counseling, such as birth control drugs

DEFINITIONS (continued)

and supplies, emergency contraception, sterilization procedures, pregnancy testing and abortion), pregnancy, disability, age, military status, unemployment status, salary history, consumer credit history (for certain titles), familial status (parent or guardian of a person under 18 years of age who is living with them), caregiver status (person who provides ongoing care for a minor child or relative with a disability or elder care), prior record of arrest or conviction (under some circumstances), marital status, partnership status, genetic information or predisposing genetic characteristics, sexual orientation, or status as a victim of domestic violence, stalking or sexual offenses. Sexual harassment is a form of gender discrimination.

SEXUAL HARASSMENT – Unwelcome sexual advances, requests for sexual favors and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

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

NOTE *Conduct which can, in certain circumstances, be considered sexual harassment includes, but is not limited to, sexually suggestive remarks, pictures, gesturing, verbal harassment or abuse of a sexual nature, subtle or direct propositions for sexual favors, and any unnecessary or unwanted touching, patting or pinching.*

DISABILITY – Any physical, medical, mental, or psychological impairment, or a history or record of such impairment.

1. Physical, medical, mental, or psychological impairment refers to:
   a. An impairment of any system of the body; including, but not limited to, the neurological system; the musculoskeletal system; the special sense organs and respiratory organs, including, but not limited to, speech organs; the cardiovascular system; the reproductive system; the digestive and genito-urinary systems; the hemic and lymphatic systems; the immunological systems; the skin; and the endocrine system; or
   b. A mental or psychological impairment.
2. In the case of alcoholism, drug addiction or other substance abuse, the term 'disability' only applies to a person who:
   a. Is recovering or has recovered, and
   b. Is currently free of such abuse.

NOTE *An employee or applicant who requires a reasonable accommodation related to their disability shall complete a* ***REASONABLE ACCOMMODATION REQUEST (PD407-015B)*** *and forward, as appropriate (see A.G. 332-21, "Reasonable Accommodations for Employees and Applicants"). This form is readily available on the Department Intranet.*

DEFINITIONS (continued)

RETALIATION – It is unlawful to retaliate against or harass any person for filing an EEO complaint, participating in an EEO investigation or proceeding, or opposing or reporting any policies, practices or action which they believe to be discriminatory. Retaliation is also prohibited against any person requesting a reasonable accommodation. Any member of the service who engages in such retaliation or harassment will be subject to disciplinary action regardless of the findings of the initial EEO investigation or proceeding.

CONFIDENTIALITY – The OEEO and all Department uniformed and civilian supervisors, managers and EEO Liaisons will treat each complaint CONFIDENTIALLY. This means that information obtained from the complaint or revealed during the course of the investigation conducted by the OEEO will not be discussed with other personnel except as necessary to investigate and resolve the complaint or other matter or as required by law. Complainants should make every effort to maintain the confidential nature of this process. Witnesses and respondents of an EEO investigation shall not discuss the nature of the complaint being investigated by the OEEO or any aspect of an open or closed OEEO case with anyone except their union representative of a line organization and/or legal counsel.

All EEO complaints will be handled under the direction of the Commanding Officer, Office of Equal Employment Opportunity. In appropriate cases, the investigation will be conducted in conjunction with the Internal Affairs Bureau and other Department units as necessary or required.

REPORTING REQUIREMENTS

I. Any non-supervisory member of the service is *strongly encouraged* to report the complaint or the problem to the OEEO, a supervisor or manager at any level, or an EEO Liaison when the member of the service:
   a. Becomes aware of an employment discrimination or sexual harassment complaint or problem; or
   b. Becomes aware of a complaint or problem of retaliation for making an EEO complaint or participating in an EEO investigation; or
   c. Is asked or encouraged to retaliate against a member of the service for making an EEO complaint or participating in an EEO investigation.

II. Any supervisor, manager or EEO Liaison *must* report the complaint or problem to the OEEO as soon as possible, or by the next business day, when the member of the service:
   a. Observes conduct of a discriminatory nature; or
   b. Becomes aware of an allegation or complaint of employment discrimination or sexual harassment; or
   c. Observes or becomes aware of any act of retaliation regarding EEO matters
   d. The member must report and shall not investigate the observed conduct, allegation, or complaint of employment discrimination, sexual harassment, or retaliation.

NOTE *In order to ensure confidentiality, supervisors and EEO Liaisons must not make any entries regarding a complaint of employment discrimination and/or related retaliation in any official Department record.*

PROCEDURE When a member of the service or an applicant for employment believes that employment discrimination or sexual harassment exists as defined herein, and in the **Equal Employment Opportunity Policy Statement (SP 297)** and/or **Sexual Harassment Policy Statement (SP 281)**, or that retaliation relating to EEO issues has occurred:

MEMBER CONCERNED

1. File a complaint of employment discrimination and/or related retaliation with any of the following:
   a. Office of Equal Employment Opportunity by telephone at [redacted], by email at [redacted], by facsimile at [redacted], in writing, or in person at 375 Pearl Street, 15th Floor, Suite 4, New York, NY 10038; or
   b. Supervisor (uniformed or civilian); or
   c. Manager; or
   d. Commanding officer; or
   e. Equal Employment Opportunity Liaison.

NOTE *After business hours and on weekends, the OEEO receives messages via office voice mail, and email and will make return phone calls on the next business day.*

Non-supervisory members of the service may telephone the OEEO anonymously to file a complaint and/or discuss matters regarding employment discrimination and/or related retaliation. An investigator assigned to the OEEO will be able to provide counseling and take appropriate follow-up action. Members concerned should understand that the cooperation of complainants and witnesses may be needed to rectify or address a problem of employment discrimination. Non-supervisory members of the service may report an allegation(s) of employment discrimination and/or related retaliation in writing anonymously by preparing a detailed written report and forwarding the report to the Office of Equal Employment Opportunity, One Police Plaza, New York, New York 10038.

COMPLAINT OF EMPLOYMENT DISCRIMINATION (PD413151) *forms will be readily available for viewing and printing on the Department Intranet.*

SUPERVISOR/ MANAGER/C.O./ EEO LIAISON

2. Immediately upon observing conduct of a discriminatory or retaliatory nature, or becoming aware of an allegation or complaint of employment discrimination, sexual harassment or retaliation relating to an EEO issue:
   a. Telephone facts to the OEEO during business hours or the next business day, Monday through Friday, 0800 to 1800 hours
      (1) During non-business hours, leave a message on voice mail with contact number and an investigator assigned to the OEEO will contact caller

SUPERVISOR/ MANAGER/C.O./ EEO LIAISON (continued)

b. Obtain OEEO case or inquiry number and name of the investigator

c. Be guided by information received from the OEEO.

NOTE *A supervisor receiving an allegation of employment discrimination, sexual harassment and/or related retaliation against oneself must immediately notify the OEEO.*

SUPERVISOR/ MANAGER/C.O.

3. If matter is issued a OEEO case number, forward **confidential** report on **Typed Letterhead** to the OEEO (DIRECT), within five business days.

NOTE *Any supervisor or EEO liaison who fails to report an employment discrimination complaint or problem, including retaliation, to the OEEO as required, and/or within the required time frames and/or who fails to take such actions as directed by the OEEO to prevent employment discrimination, including sexual harassment and retaliation, from occurring in the future will be subject to disciplinary action.*

The Department prohibits the display in any form of offensive sexual, ethnic, racial, religious or other discriminatory material in or while using Department facilities or resources. Refer to A.G. 332-02, "Sexual, Ethnic, Racial, Religious, or Other Discriminatory Slurs Through Display of Offensive Material," for guidelines on handling incidents involving the display of offensive material.

OEEO

4. Notify commanding officer/manager, if and/or when appropriate.
5. Emphasize to the commanding officer/manager and all others concerned that reprisal or retaliation against complainants and/or witnesses is against the law and allegations of retaliation will be investigated and, if substantiated, members will be subject to disciplinary action.
6. Record required data in appropriate OEEO record and assign a case or inquiry number to all complaints.

NOTE *Upon receiving a complaint, an investigator assigned to the OEEO will attempt to contact and interview the complainant, and will advise the complainant that they may meet with an investigator to discuss the complaint at the OEEO or at a mutually agreed discreet location of their choice before, during or after work hours to protect their confidentiality. Additionally, the member will be advised that they may be accompanied by a representative of their choice.*

Members are reminded that they do not have to notify a supervisor if they agree to meet with an OEEO investigator during non-working hours.

However, if a complainant wishes to meet with an investigator during working hours, the investigator will make a confidential notification to the command's integrity control officer, assistant integrity control officer, executive officer, commanding officer or other supervisory member not involved in the complaint to have the complainant appear at the OEEO. Supervisors cannot unreasonably deny permission to attend the meeting. A member's appearance at the OEEO must not be documented on any official Department record.

OEEO (continued)

7. Counsel member filing complaint about options for handling complaint and/or refer member to other personnel for assistance.
8. If it is determined that an investigation is to be conducted, notify respondent in writing of the nature of the allegation(s), when necessary.
   a. Remind respondent that employment discrimination and/or related retaliation will not be tolerated and may be subject to discipline.
9. After completion of the investigation and when appropriate, forward results of the investigation conducted by the OEEO to the Police Commissioner with recommendations for specific corrective action.
10. Notify complainant in writing of the outcome of the investigation and any corrective/disciplinary action taken.
    a. Notify respondent about the outcome of the investigation in writing when appropriate.

COMMANDING OFFICER/ MANAGER

11. Address the matter as directed by and under the guidance of the OEEO.
12. When directed, forward confidential report on Typed Letterhead to OEEO (DIRECT).
    a. Refer to OEEO case number.
    b. Report what corrective action was taken to address the complaint and describe any steps taken to preclude a reoccurrence.
13. Take all reasonable steps necessary to prevent the respondent from engaging in additional employment discrimination and related retaliation.

NOTE

Copies of all documents related to OEEO complaints and investigations must be kept in a confidential file maintained by the commanding officer/supervisory designee consistent with the confidentiality requirements of this directive.

ADDITIONAL DATA

COUNSELING

The complainant will be interviewed to ascertain the details of the complaint and will be apprised of the options for handling the complaint. These may include:

a. Investigation by the OEEO
b. Mediation by a neutral mediation service
c. Further actions the member of the service can take on their own behalf
d. The member of the service filing a formal complaint with an outside agency
e. Referral of the member concerned to other personnel for assistance if it appears that the complaint does not involve an EEO problem.

MEDIATION

In appropriate cases, certain EEO complaints will be referred for mediation by a neutral mediator at a neutral location. Mediation is an early dispute resolution program designed to help resolve EEO complaints at the earliest stage possible without the need for a formal investigation. The procedure is not adversarial, but is a means of finding a mutually acceptable end to the parties' differences. This process is voluntary and the parties must mutually agree to the outcome. If the parties cannot agree upon a resolution, the matter will be referred back to the OEEO for appropriate action. If a resolution is reached after mediation, no notations concerning the matter will be made on the respondent's Central Personnel Index record.

ADDITIONAL DATA (continued)

INVESTIGATION

In order to encourage members of the service to come forward, all communications between complainants and the OEEO relating to employment discrimination complaints will be kept confidential consistent with the above statement regarding CONFIDENTIALITY. Any person who is interviewed in the course of an investigation shall have the right to be accompanied by a representative of their choice.

An investigation will be conducted by the OEEO or a person acting under the direction of the Police Commissioner. The investigation begins after the OEEO:

a. Receives either an oral or a written complaint of employment discrimination and/or related retaliation, and

b. Determines that the allegations in the complaint are sufficient to establish a case of unlawful employment discrimination and/or related retaliation.

After receiving the notice and copy of the complaint, the respondent has the right to respond in writing within fourteen calendar days. Respondents must maintain the confidentiality of the EEO process.

At the conclusion of an investigation, the OEEO will forward a confidential report of the investigation to the Police Commissioner. If the OEEO concludes on the basis of the investigation that the allegation of employment discrimination is substantiated, the OEEO shall recommend appropriate corrective action. The Police Commissioner will review the report prepared by the OEEO and make a final determination regarding the investigation and any recommendation for corrective action. Disciplinary action shall be taken in accordance with any applicable provisions of law, rules and regulations, and collective bargaining agreements.

Following the endorsement by the Police Commissioner of a recommendation by the OEEO that an EEO complaint is:

a. Substantiated, in whole or in part, the Commanding Officer, OEEO will require the commanding officer of the involved command or other appropriate person to appear at its office to discuss the final report with themselves or designee. The commanding officer or other appropriate person shall take action as may be directed by the Commanding Officer, OEEO. The meeting as well as a record of action taken shall be documented in the case file.

b. Unsubstantiated (as opposed to "unfounded"), the Commanding Officer, OEEO may require the commanding officer of the involved command or other appropriate person to appear at its office to discuss the final report with themselves or designee. The commanding officer or other appropriate person shall take action as may be directed by the Commanding Officer, OEEO. The meeting, as well as a record of action taken, shall be documented in the case file.

If the Commanding Officer, OEEO concludes, as a result of an investigation, that an act of employment discrimination and/or related retaliation has occurred but cannot identify the person(s) responsible, the Commanding Officer, OEEO may require the commanding officer/manager of the command/unit of occurrence or other appropriate person to appear at the OEEO to discuss the final report with themselves or designee. The commanding officer or other appropriate person shall take action as may be directed by the Commanding Officer, OEEO. The meeting and a record of action taken shall be documented in the case file.

ADDITIONAL DATA (continued)

When charges and specifications are pending or preferred against a member of the service, an allegation of discriminatory treatment raised as a defense to the charges by the respondent member of the service shall vest in the exclusive jurisdiction of the Deputy Commissioner, Trials until the charges and specifications have been resolved. After the charges and specifications have been resolved, jurisdiction over the allegation of employment discrimination shall be assumed by the Commanding Officer, OEEO upon written request of the affected party. In all other disciplinary matters, any allegation of employment discrimination raised by the member of the service concerned must be immediately reported to the OEEO.

ADDITIONAL PLACES WHERE A COMPLAINT OF DISCRIMINATION MAY BE MADE

Any member of the service or applicant for employment who believes that they have experienced discrimination has a right to file a formal complaint with the federal, state or local agencies listed below. A person does not give up this right when the person files a complaint with the Police Department's OEEO. The following local, state and federal agencies enforce laws against discrimination:

NEW YORK CITY COMMISSION ON HUMAN RIGHTS (NYCCHR)

Main Office (Manhattan)
22 Reade Street
New York, New York 10007
Telephone: (212)306-7450

Brooklyn Community Service Center
25 Chapel Street, Suite 1001
Brooklyn, NY 11201
718-722-3130

Bronx Community Service Center
1932 Arthur Avenue, Room 203A
Bronx, NY 10457
718-579-6900

Queens Community Service Center
153-01 Jamaica Avenue, 2nd Floor
Jamaica, NY 11432
718-657-2465

Staten Island Community Service Center
60 Bay Street, 7th Floor
Staten Island, NY 10301
718-390-8506

NEW YORK STATE DIVISION OF HUMAN RIGHTS (NYSDHR)

One Fordham Plaza, 4th Floor
Bronx, NY 10458
Telephone: (718)741-3223
OR

ADDITIONAL DATA (continued)

163 West 125th Street, 4th Floor
New York, NY 10027
Telephone: (212)961-8650
OR
Office of Sexual Harassment Issues/Queens
55 Hanson Place, Room 1084
Brooklyn, New York 11217
Telephone: (888)392-3644

UNITED STATES EQUAL EMPLOYMENT OPPORTUNITY COMMISSION

New York District Office
33 Whitehall Street, 5th Floor
New York, New York 10004
Telephone: (800)669-4000"

TIME PERIODS FOR THE FILING OF COMPLAINTS OF EMPLOYMENT DISCRIMINATION, INCLUDING RELATED RETALIATION (MEASURED FROM THE DATE OF THE LAST OCCURRENCE OF A DISCRIMINATORY ACTION):

a. New York City Police Department - one year
(1) New York City Police Department - three year statute of limitations (for complaints of sexual harassment only)

The one year time period for filing complaints of employment discrimination, including related retaliation, with the New York City Police Department shall not serve as a limitation upon the Department's authority to discipline members of the service as otherwise authorized pursuant to applicable law

b. New York City Commission on Human Rights – one year (New York City Administrative Code, Title 8, Chapter 1) (Three years for sexual harassment)

c. New York State Division of Human Rights - one year (New York Executive Law, Article 15, section 297) (may not file if civil action filed first)

d. United States Equal Employment Opportunity Commission – three hundred days, regardless of whether there has been a prior filing with another agency. A member of the service is advised to contact the United States Equal Employment Opportunity Commission directly for guidance on this issue (42 USC, Section 2000e-5[c]).

Appendix E

3-01/121.00 - Policy of Equality

All Department members are required to conduct themselves in accordance with the entirety of this Policy of Equality, and all applicable local, county, state, and federal laws.

PURPOSE

This policy is intended to preserve the dignity, respect, and professionalism of the workplace as well as protect the right of employees to be free from discrimination, harassment, retaliation, and inappropriate conduct toward others based on a state or federal protected characteristic. Discrimination, harassment, retaliation, and inappropriate conduct toward others are absolutely contrary to the values of the Department and to the law enforcement profession as a whole. Discrimination, harassment, and retaliation are also illegal under local, county, state, and federal law.

The Department will not tolerate unlawful discrimination on the basis of the following **protected characteristics**:

- Age (40 and over);
- Ancestry;
- Color;
- Denial of family and medical care leave;
- Disability (physical and mental, including HIV and AIDS);
- Ethnicity;
- Gender identity/gender expression;
- Genetic information;
- Marital status;
- Medical condition (genetic characteristics, cancer, or a record or history of cancer);
- Military or veteran status;
- National origin (including language use restrictions);
- Race;
- Religion (includes religious dress and grooming practices);
- Sex/gender (includes pregnancy, childbirth, breastfeeding, and/or related medical conditions);
- Sexual orientation; and
- Any other characteristic protected by state or federal law.

The Department will not tolerate unlawful harassment or retaliation. As a preventive measure, the Department also will not tolerate inappropriate conduct toward others based on a protected characteristic, even if the conduct does not meet the legal definition of discrimination, harassment, or retaliation.

All Department members are responsible for conducting themselves in accordance with this policy and its associated procedures. Violation of the policy and/or procedures will lead to prompt and appropriate Departmental action including, but not limited to, counseling, training, written reprimand, suspension, demotion, and/or discharge.

Manual of Policy and Procedures : 3-01/121.00 - Policy of Equality

Managers, supervisors, co-workers, and third-parties are prohibited from engaging in unlawful behavior under the Fair Employment and Housing Act.

Appendix F – Survey Charts

Chart No. 4 compares perceptions among men, women, and the overall employee population regarding whether they feel supported by the Department when reporting incidents of sexual harassment, gender discrimination, or retaliation.

Chart No. 4 Perceived Support from Department Personnel if Reporting Incidents of Sexual Harassment, Gender Discrimination, or Retaliation

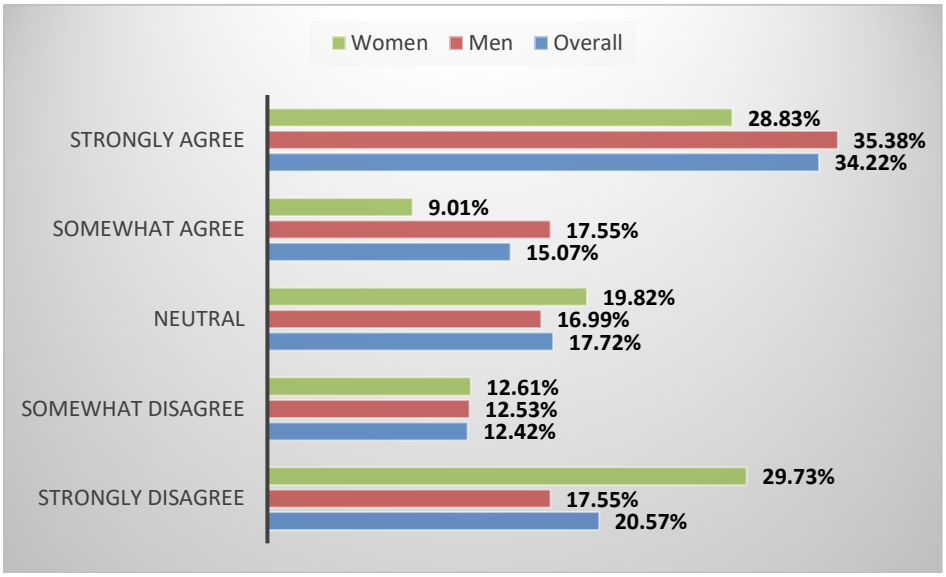


Chart No. 5 shows how men, women, and the overall sworn employee population perceive whether the Department conducted thorough investigations into reports of sexual harassment, gender discrimination, or retaliation. Chart No. 6 compares the same groups' perceptions about whether supervisors took prompt action after such incidents were reported. These charts highlight differences in perception by gender regarding how effectively and promptly the Department responds to these serious workplace issues.

Chart No. 5 The Department Conducts Thorough Investigations of Complaints of Sexual Harassment, Gender Discrimination, or Retaliation

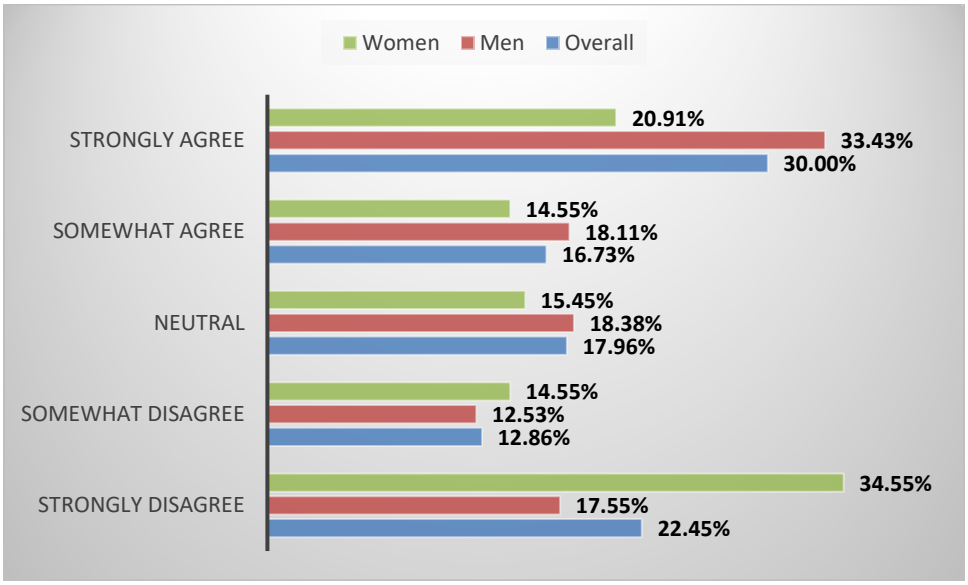


Chart No. 6 Supervisors Took Prompt Action to Address Reported/Observed Incidents of Sexual Harassment, Gender Discrimination, or Retaliation

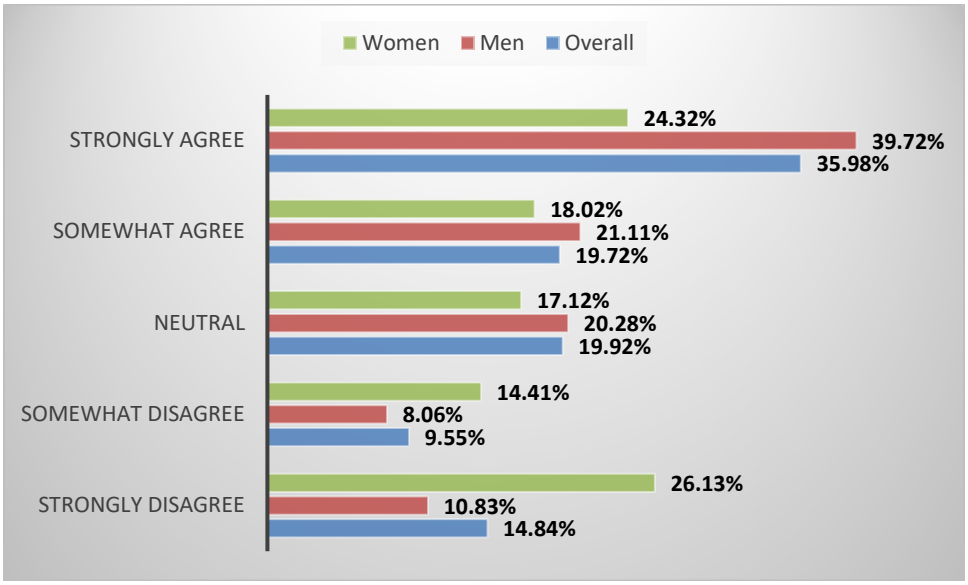


Chart Nos. 7 through 9 compare the perceptions of men, women, and the overall employee population regarding promotional practices within the Department.

Chart No. 7 The Department Supports My Gender Group for Promotions

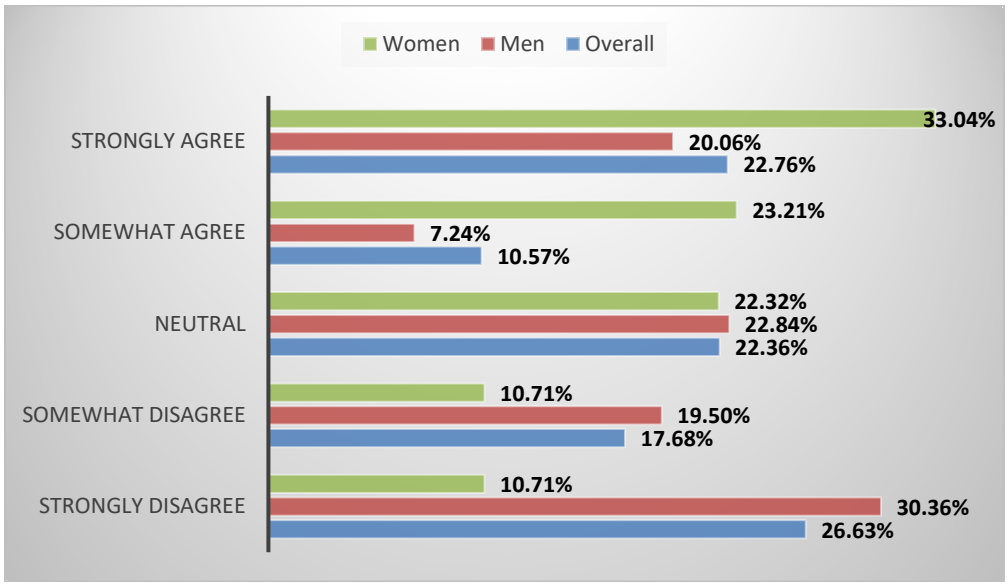


Chart No. 8 Promotion Fairness

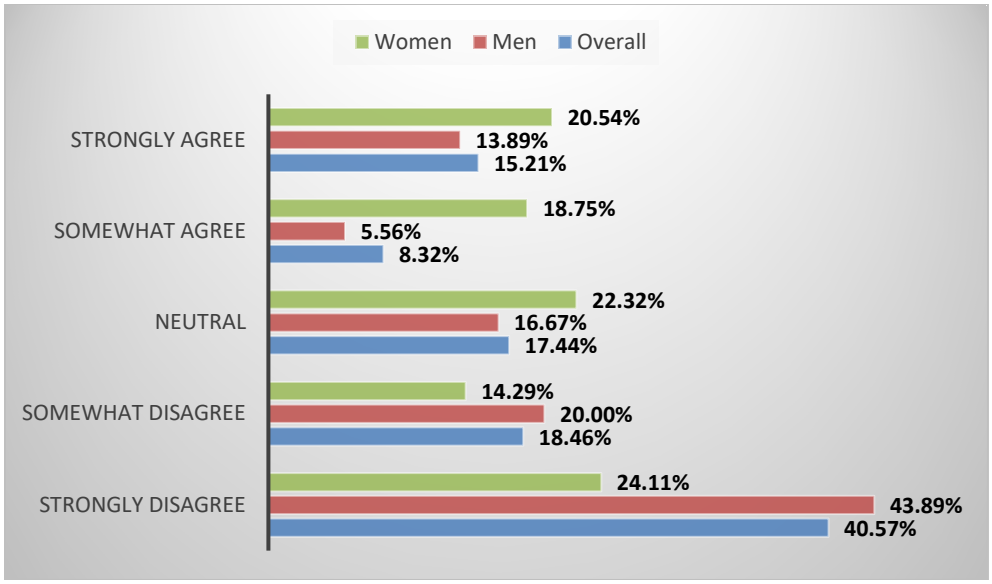


Chart No. 9 Promotion Based on Merit

