

## SEAM COMPLAINT PROCESS

### Y.1 PURPOSE

This SEAM Article establishes the policy and procedures that govern the Cook County Sheriff's Office employment action and are a reiteration of standing practice, which prevents any political influence on this process.

### Y.2 POLICY

The Director of Compliance for SEAM will investigate any complaints regarding violations of SEAM and shall certify that no political consideration was part of any decision that they made or action that they took relating to the complaint.

### Y.3 COMPLAINTS REGARDING SEAM

If any Sheriff's Office employee has reason to believe conduct has or is occurring during the course of any employment action and is in violation of SEAM ("a violation"), they shall file a complaint with the Director of Compliance. Employees may file a complaint by either:

- (a) Emailing the Director of Compliance at [ccso.complianceofficer@ccsheriff.org](mailto:ccso.complianceofficer@ccsheriff.org); or
- (b) Contacting the Complaint Line via phone at (312) 603-5094.
  - 1. The complaint line will allow individuals to call and leave a message on an anonymous or credited basis, to register complaints regarding their good faith belief of a violation, the occurrence of prohibited political contacts or prohibited political discrimination.
  - 2. Notice of the existence and number of the complaint line shall be posted on the Sheriff's Office Website and SheriffNet.
  - 3. All recorded complaints will be reviewed by the Director of Compliance.

#### Y.3.1 DIRECTOR OF COMPLIANCE RESPONSIBILITIES

- (a) The Director of Compliance will investigate all complaints alleging a violation. At their discretion and to facilitate communication, the Director of Compliance may refer any matters alleging prohibited political discrimination or other misconduct to the Executive Director of the Office of Professional Review (OPR).

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- (b) Upon receipt of a complaint alleging a violation involving a pending or proposed employment action, the Director of Compliance shall investigate the complaint.
- (c) If during the course of the investigation, the Director of Compliance determines that a violation has occurred and that the violation may have been based on prohibited political discrimination, or that there is evidence of prohibited political discrimination in the alleged conduct, the Director of Compliance shall refer the complaint for further investigation of any prohibited political discrimination to the Executive Director of OPR.
- (d) The Director of Compliance shall advise the Executive Director of Human Resources (HR) of all complaints. The Executive Director of HR in consultation with the Director of Compliance and/or the Executive Director of OPR (if prohibited political discrimination is part of the investigation), may temporarily suspend or terminate the proposed or pending employment action while the complaint is investigated. During any investigation by the Director of Compliance or OPR (if prohibited political discrimination is a factor), the Executive Director of HR, with approval from either the Director of Compliance and/or OPR (in the case of a prohibited political discrimination investigation), may:
  - 1. Continue the temporary suspension of the employment action until the investigation is complete; or
  - 2. Release the suspension and allow the process to proceed. In the event the Executive Director of HR elects to release the suspension, they shall document the reason and provide it to the Director of Compliance and/or OPR if the investigation involves prohibited political discrimination.
- (e) Upon conclusion of an investigation regarding a violation, the Director of Compliance shall issue a written report setting forth their findings and recommendations for corrective action. The report shall include the following:
  - 1. A description of any complaints or other information received by the Director of Compliance pertinent to the investigation;
  - 2. A description of any violation of any process or procedure or other non-compliance with SEAM observed or discovered in the course of the investigation; and
  - 3. Such other information as the Director of Compliance may deem relevant to the investigation or resulting recommendations.
- (f) The recommendations of the Director of Compliance's report shall be provided to the General Counsel, the Executive Director of HR, the Executive Director of OPR (if there is

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evidence of prohibited political discrimination), and any other notification as specified by the report, via email. The recommendations shall include:

1. A description of any alleged violation or other information received by the Director of Compliance pertinent to the investigation;
2. A summary and description of the nature and scope of the investigation and any findings;
3. A recommendation either that no action be taken or that a specific action be taken; and
4. An explanation for the recommendation that either no action be taken or for the specific action recommended.

Y.3.2 POLITICAL CONTACTS

Any employee who knows of or has a reasonable belief of any prohibited political contact with respect to any employment action is required to report that contact to the Director of Compliance.

- (a) The Director of Compliance will record the prohibited political contact on the Contact Log and will review the reported contact.
  1. If the Director of Compliance determines the alleged prohibited political contact is not prohibited, they will document the reasons for the determination and will close the investigation.
  2. If the Director of Compliance cannot make a determination that the alleged prohibited political contact is prohibited, the Director of Compliance will refer the contact to OPR for investigation. The Director of Compliance will include such political contacts on a Contact Log.
- (b) OPR shall investigate all prohibited political contacts referred by the Director of Compliance. Upon conclusion of an investigation, OPR shall issue a written report. The report shall be filed with the Executive Director of HR and the Director of Compliance and may be filed with the respective department head affected by or involved in the investigation. The report shall include the following:
  1. A description of any complaints or other information received by OPR pertinent to the investigation;

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2. A description of any prohibited political contacts observed or discovered in the course of the investigation;
  3. Recommendations for correction of any unlawful conduct or non-compliance described in the report; and
  4. Any other information as OPR may deem relevant to the investigation or resulting recommendations.
- (c) The recommendations of an OPR Report shall be provided to individuals upon written request either in person or via email if so requested. The recommendations shall include:
1. A summary of the complaint;
  2. A summary and description of the nature and scope of the investigation and any findings;
  3. A recommendation either that no action be taken or that a specific action (e.g., discipline, other corrective measures) be taken; and
  4. An explanation for the recommendation that either no action be taken or for the specific action recommended.
- (d) The Director of Compliance shall review OPR reports and, if the Director of Compliance does not agree with OPR's determination, they may append a written objection to the report which objection shall be included as part of the report and the recommendations. If the reports also involve claims of violations or prohibited political discrimination, those claims shall be handled as provided in this policy.

### Y.3.3 PROHIBITED POLITICAL DISCRIMINATION

Any employee who knows or has a reasonable belief of the existence of any prohibited political discrimination or receives a complaint of any prohibited political discrimination with respect to any employment action or of any violation of Sheriff's Office policies/procedures is required to report that complaint to the Executive Director of OPR as soon as practicable.

- (a) OPR shall investigate all complaints involving allegations of prohibited political discrimination. Upon conclusion of an investigation, OPR shall issue a written report. The report shall be filed with the Executive Director of HR and the Director of Compliance and may be filed with the respective department head affected by or

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involved in the investigation. The report shall include the following:

1. A description of any complaints or other information received by OPR pertinent to the investigation;
  2. A description of any prohibited political discrimination, prohibited political contacts or non-compliance with SEAM observed or discovered in the course of the investigation;
  3. Recommendations for correction of any unlawful conduct or non-compliance described in the report; and
  4. Any other information as OPR may deem relevant to the investigation or resulting recommendations.
- (b) The recommendations of an OPR report shall be provided to individuals upon written request either in person or via email if so requested. The recommendations shall include:
1. A summary of the complaint;
  2. A summary and description of the nature and scope of the investigation and any findings;
  3. A recommendation either that no action be taken or that a specific action be taken; and
  4. An explanation for the recommendation that either no action be taken or for the specific action recommended.
- (c) The Director of Compliance shall review OPR reports and, if the Director of Compliance does not agree with OPR's determination, they may append a written objection to the report which objection shall be included as part of the report and the recommendations. If the reports also involve claims of violations, those claims shall be handled as provided in this Article.

Y.3.4 REPORTS

- (a) The reports setting forth the written findings and recommendations of the Director of Compliance and OPR shall be given to the Executive Director of HR and General Counsel. OPR reports and Director of Compliance reports shall not mention the name of

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any informant, complainant, witness or person investigated, except where the copy of the report given to the respective department head recommends disciplinary action against an employee. OPR and the Director of Compliance shall redact the names of non-party witnesses and may redact personal identifying information or other information if such personal or other information may reveal or undermine an ongoing investigation.

- (b) The Executive Director of HR shall review the findings and recommendations with the respective department head involved in the complaint. The Executive Director of HR shall act on such recommendations within 30 days. The Executive Director of HR may also suspend or terminate the employment action, if applicable, and impose other remedial actions. If the recommendations of the Director of Compliance or OPR are not followed, the Executive Director of HR must send a written report to the Executive Director of OPR and the Director of Compliance describing the reasons for not following such recommendations and what action, if any, the Executive Director of HR has taken in response to the complaint.