



October 11, 2024

Interim Chief Sue Rahr  
Seattle Police Department  
PO Box 34986  
Seattle, WA 98124-4986

Dear Chief Rahr:

Please see the below Management Action Recommendation.

**Case Number**

- 2022OPA-0329 / 2024COMP-0008

**Topic**

- Equal Employment Opportunity (EEO) Complaints and Investigations

**Summary**

- It was alleged that a named employee alerted a colleague about a potential harassment claim filed against that colleague.

**Analysis**

- Seattle Police Department Policy Manual 5.040<sup>1</sup> and the EEOC and City of Seattle Personnel Rules cover harassment allegations. SPD Policy 5.040-POL-7 states, “Supervisors and managers shall maintain confidentiality of EEO complaints and investigations.”
- EEOC (2023) guidelines<sup>2</sup>, cited in SPD’s policy manual, instructs, “Employers should strive to create an environment in which employees feel free to raise concerns and are confident that those concerns will be addressed.”
- However, SPD’s policy does not address nonsupervisory employees’ duty to “maintain [the] confidentiality of EEO complaints and investigations,” as it does for supervisors and managers.
- By allegedly revealing a potential EEO complaint, the named employee may have contributed to an environment where employees feel discouraged from raising EEO concerns.

**Recommendations**

- SPD should consider extending the obligation not to disclose information about EEO complaints, investigations, and potential EEO complaints to nonsupervisory employees.
- Specifically, rather than referencing the EEOC, SPD should consider adding the following to SPD Policy 5.040: “Employers should strive to create an environment in which employees feel free to raise concerns and are confident that those concerns will be addressed.” Like the personnel rules, it should discourage behaviors that may negatively impact other employees’ confidence in reporting allegations.

I appreciate your consideration, and I look forward to your response.

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<sup>1</sup> Seattle Police Department Policy Manual (04/01/2019). “Policy 5.040, EEO Complaints and Investigations.” <https://public.powerdms.com/Sea4550/tree/documents/2042879>

<sup>2</sup> U.S. Equal Employment Opportunity Commission (2024). “Harassment.” <https://www.eeoc.gov/harassment>



Sincerely,

A handwritten signature in blue ink, appearing to read "Gino Betts, Jr.".

Gino Betts, Jr.  
Director, Office of Police Accountability