

SOUTHWESTERN

LAW SCHOOL Los Angeles, CA

Staff Formal Complaint Process

Administrative policy approved December 10, 2025. Effective immediately.

Revision history: New; this policy supplements the Employee Handbook.

Related policies: Policy to Prevent Discrimination, Harassment, and Retaliation; Sexual Misconduct Policy; Employee Handbook; Whistleblower Policy; Disability Accommodation Policy for Employees and Job Applicants

Related forms: Staff Formal Complaint Process Form

Scheduled Review Date: June 2026 (Human Resources)

A. Overview

Southwestern Law School takes staff member concerns and complaints seriously. If a staff member is unable to resolve employment-related concerns after following the procedures set forth in Section J of the Employee Handbook (Grievance Procedure), they may escalate the issue under the Staff Complaint Process described in this policy. The Staff Complaint Process is not available to faculty, student employees, independent contractors, or employees of staffing agencies.

The process excludes the following types of complaints that must be addressed through other processes:

- Sexual harassment (see Sexual Misconduct Policy on the Institutional Policies webpage);
- Discrimination or harassment (see Policy to Prevent Discrimination, Harassment, and Retaliation on the Institutional Policies webpage);
- Disability accommodation (see Disability Accommodation Policy for Employees and Job Applicants on the Institutional Policies webpage); or
- Workplace violence (see Workplace Violence Prevention Plan on the Institutional Policies webpage).

If a staff member is not certain which policy applies, they should seek clarification from Human Resources at hr@swlaw.edu before proceeding. Human Resources will route the complaint to the proper procedure so that it is handled appropriately. Complaints misdirected under this policy will be referred by Human Resources to the correct process.

or administrator, and the staff member will be notified in writing accordingly.

Participating in this process does not limit Southwestern's ability to address unrelated performance or conduct concerns.

B. Informal Resolution Process

Southwestern encourages staff members to first try to resolve any employment-related concerns informally and at the department level by communicating directly with their immediate supervisor, preferably in person or synchronously. If that process does not sufficiently address the staff member's concern, Southwestern encourages them to engage with their department head to assist in an informal resolution. If speaking with the supervisor or the department head does not resolve the matter, the staff member may seek resolution by following the steps outlined below. See Section J of the Employee Handbook for situations in which an employee is not required to meet with their supervisor or department head first.

C. Filing and Response Timelines

If a staff member fails to file a complaint or proceed with the process in accordance with the timelines outlined in this policy, they will waive their right to proceed with the complaint under these guidelines. Unless stated otherwise in this policy, time limits set forth are in calendar days and exclude recognized Southwestern holidays and winter recess.

Terminated staff members must submit their complaint within 60 calendar days of the action on which the complaint is based.

D. Interim Actions

When appropriate, Southwestern may implement temporary workplace adjustments (such as modified reporting lines, remote work, or changes in duties) while a formal complaint is under review. Interim adjustments are not findings of wrongdoing and may be discontinued or changed at any time.

E. Formal Complaint Resolution Process

1. Resolution by Human Resources (HR)

If a staff member is unable to resolve their concerns via informal discussions, they must describe the complaint in writing and submit the formal complaint to HR at HR@swlaw.edu within 30 calendar days of the occurrence that led to the complaint.

HR will consider a late-filed complaint if HR determines that good cause existed for the Complainant's delayed submission.

A staff member who submits a formal complaint will be referred to as the Complainant.

The Complainant should include:

- The Complainant's full name;
- Where relevant, the specific policy or procedure that the Complainant believes was misapplied, violated, or not followed;
- A statement of relevant facts (who, what, when, where) and any other basis for the complaint;
- The names and, if available, contact information for individuals who possess relevant information about the matter and a summary of the information they possess;
- Any supporting documents or other relevant evidence the Complainant possesses (attachments may be included if relevant);
- A summary of any informal resolution efforts already attempted and the outcome of those efforts; and
- The specific result, resolution, and remedies sought.

HR may interview individuals, review electronic or physical documents, request additional information as reasonably necessary to address the complaint, and take other steps necessary to investigate and resolve the complaint.

HR will endeavor to acknowledge receipt of the complaint within 5 business days. HR will investigate the concerns raised by the complaint and respond in writing within 21 calendar days of receipt of the written complaint; if more time is needed to investigate, HR will inform the Complainant and provide a reasonable estimate of the additional time needed.

Except as provided below, once Human Resources issues its final written decision (typically, a memorandum), the complaint is considered closed, and no further internal review is available. A Complainant may, however, submit a written request to the Chief Operating Officer for reconsideration if the Complainant has new information that was not reasonably available at the time of the final decision and that would likely have resulted in a different outcome.

2. Standard of review

In reviewing formal complaints, HR will determine whether applicable Southwestern policies or procedures were substantially applied correctly and reasonably under the circumstances.

3. Scope of remedies

Available remedies under this process may include clarification of policy application, performance counseling, training, performance improvement plan, or other administrative action, but do not include monetary damages, reinstatement of employment, or any limitation on the law school's at-will employment status.

4. Consolidating complaints

Southwestern may consolidate related complaints submitted by the same staff member or by staff members where the concerns are sufficiently related to ensure a fair and efficient resolution process.

F. Confidentiality

Although Southwestern cannot guarantee that a complaint will be kept confidential due to the need to investigate the complaint, it will use its best efforts to limit the dissemination of information concerning the complaint to those who have a legitimate need to know.

G. No Retaliation

Southwestern strictly prohibits retaliation against any staff member who, in good faith, makes a complaint under this policy (or any other Southwestern policy) or against any individual who participates in the investigation or resolution of a complaint.

Retaliation includes any adverse action or threat aimed at penalizing or intimidating an individual for filing a complaint, supporting a complaint, or otherwise being involved in the process. Any faculty member, employee, or student who retaliates against a person for using this policy in good faith will be subject to disciplinary action under the appropriate conduct code, handbook, or manual (for students, this means the Student Honor Code or Code of Student Professionalism and Conduct; for employees, it means the Employee handbook or a specific policy; for full-time faculty, it means the Faculty Manual or a specific policy; for adjunct faculty, it means Adjunct Faculty Manual or a specific policy).

If any person believes they are experiencing retaliation related to a complaint, they should immediately report the situation to the General Counsel (jxanders@swlaw.edu). The law school will take prompt action to investigate and address any alleged retaliation.

Southwestern's goal is to ensure that individuals can freely express concerns, pursue complaints, and participate in complaint processes without fear of reprisal, which is essential to maintaining an environment of accountability and fairness.

H. Advice and Assistance

Because this is an internal process, legal counsel is not permitted to represent staff members in any proceedings under this policy.

I. At-Will Employment Status

Nothing in this policy alters in any way the at-will employment status of staff members.

J. Questions

Any questions about the interpretation or application of this policy should be directed to hr@swlaw.edu.

K. Policy Revisions

Southwestern expressly reserves the right to change, modify, or update any aspect of this policy at any time, with appropriate notice to the law school community. Generally, the law school will provide at least 15 days' notice before a material change to this policy takes effect. Notice may be given via email, campus announcement, or posting on the law school's policy website. Complaints that were initiated before a policy change will typically be handled under the policy provisions that were in effect at the time the complaint was originally submitted, unless both the Complainant and Southwestern agree to proceed under the updated policy.