

## **ANTI-HARASSMENT POLICY FOR TI-S ORGANISED EVENTS AND MEETINGS<sup>1</sup> 05 JUNE 2015**

### **1. Purpose**

In order to ensure that TI-S organised meetings and events create a positive interaction experience for all participants, this policy provides guidance to prevent, fairly investigate and stop incidents of harassment in the spirit of equality and the Transparency International's (TI) values:

*Transparency, Accountability, Integrity, Solidarity, Courage, Justice, and Democracy.*

As a meeting/event organiser, TI-S is committed to ensure a harassment-free environment for all participants. Every participant should feel welcome, comfortable and safe at a TI-S-organised event, and at the same time feel responsible for other participants to be equally appropriately welcomed, comfortable, and safe.

TI-S commits to set up conditions under which event participants feel enabled to report incidences of harassment and speak up.

### **2. Definitions**

*Harassment* occurs when an unwanted conduct takes place with the purpose or effect of violating the dignity of the person concerned and of creating an intimidating, hostile, degrading, humiliating or offensive environment because of a person's actual or perceived race or ethnic origin, gender, religion or belief, disability, age, sexual orientation or other aspects of their identity. *Sexual harassment* occurs when the unwanted conduct is of a sexual nature, typically an "unwelcome" sexual advance and where people are made to feel sexualized, either specifically or because of their gender and in this way diminished (for more details see also FAQs, page 2).

### **3. Scope**

This policy applies to the following TI-S organised events and meetings: Regional Meetings, TI's Annual Membership Meeting and the International Anti-Corruption Conference, as well as any event organised by TI-S in Berlin.

The policy recognises that some legal jurisdictions will have standards defined under the law applicable where the meeting is held related to harassment that create duties and obligations for the TI Secretariat. It intends to set minimum standards as well as recommends procedures and practical steps that TI-S staff, volunteers as well as participants of TI-S organised events/meetings should abide by in respect to prevention of and response to incidences of harassment. Where law in the legal jurisdiction of the meeting goes further than this policy, this should be followed.

This Policy focuses on Harassment. Broader concerns about the meeting/event itself regarding potential discriminatory practices can be directly raised with the organisers before, during and after the meeting/event.

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<sup>1</sup> In the drafting of this document other similar policies from international NGOs (CIVICUS, Amnesty International), IGOs (UNDP, EU), and the World Economic Forum were consulted.

Meeting/event organisers<sup>2</sup> as well as participants (such as National Chapter representatives, Individual Members, Senior Advisors, consultants, and service providers) are required to comply with and enforce this policy throughout the event/meeting.

#### **4. Preventive actions**

The policy will be introduced to all participants of TI-S organised events/meetings as well as persons involved in the organisation and implementation of these meetings/events. All participants must explicitly accept the policy before attending the event/meeting. TI-S staff is de facto expected to abide with this policy.

An opening statement by the Chair of the event should stress TI's zero tolerance approach towards harassment and encourage all participants to behave in that spirit.

All communication at TI-S events or meetings should be appropriate for a professional audience including participants of many different backgrounds. All participants will benefit from an insightful and supportive meeting environment. It is important to bear in mind that humour may, particularly in a culturally-diverse context, hurt participants, even if the speaker did not intend it to be. Sexual language and imagery as well as sexist, racist, or exclusionary jokes are not appropriate. TI-S meetings and events provide a space for everyone to express themselves in a gentle and cordial environment.

All participants and persons involved in the organisation and implementation of TI-S events/meetings are expected to speak up, report, and when safe to do so, intervene and defuse a harassment situation. As a meeting organiser TI-S commits to set up the enabling conditions to ensure that witnesses and perceived victims feel encouraged to speak up.

In order to defuse a potential harassment situation, the witness is expected to address the perceived harassed person and provide them with an opportunity to get away from the situation, or to openly check whether they need help.

#### **5. Principles**

The investigation and decision-making process is based on the following principles:

##### **5.1. Confidentiality**

All individuals assuming a formal role and responsibility in the implementation of this policy (e.g. as contact point, or as Review Panel members) as well as the event/meeting organisers are bound by confidentiality. The complainant, respondent and witnesses have the right to confidentiality and anonymity to the extent possible to investigate the reported complaint. At the same time, the complainant, the respondent and witnesses have the responsibility to maintain confidentiality about the reported case during as well as after the investigation and decision-making process starting with the reporting of the complaint. This includes in particular the responsibility to respect and protect the identity of the complainant, respondent and witnesses by all parties involved in the reported case.

##### **5.2. Information**

All parties involved have the right to be informed about the status of the harassment case at appropriate times. This includes in particular the right of the respondent to be informed that a case was filed against them and to respond to the allegations. All information should be

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<sup>2</sup> Meeting organisers are the TI-S employees ultimately responsible for the event/meeting, e.g. Regional Director for a Regional Meeting.

treated with utmost discretion. This might include that only selected information can be shared. A written copy of the Review Panel's conclusion and decision on actions to be taken will be given to both parties.

### **5.3. Protection from repeated offence and retaliation**

Every party involved in a reported case have the responsibility to refrain from retaliation and other behaviour which could aggravate the situation. The complainant, the respondent, witnesses as well as the persons involved in the investigation of cases have the right to be protected from any offence or retaliation during the investigation process. Appropriate actions should be implemented by the Review Panel as soon as possible. This might for example include the temporary separation of complainant, respondent and/or witnesses. In case where repeated offence and / or retaliation continue after the event, the Review Panel commits to collaborating with any relevant follow up processes.

## **6. Process**

TI-S recognises two options in resolving a problem relating to harassment. Either an attempt can be made to resolve the problem in an informal way or a formal procedure can be embarked on. Participants will not be put under any duress to accept one or other option. The decision to act either informally or formally will rest exclusively with the alleged victim of the harassment.

### **6.1. Informal Process**

The alleged victim of the harassment may find it sufficient to have the opportunity to explain to the person engaging in the unwanted conduct that the behaviour in question is not welcome, that it offends them or makes them uncomfortable, and that it interferes with their participation in the event.

The informal procedure will be facilitated by the Contact Point or the assigned TI-S representative. During the informal procedure all discussions and settled claims will be recorded and the report will be treated in the strictest confidence. The alleged victim of the harassment and perpetrator will also be expected to agree in writing that the matter had been resolved.

If this approach does not resolve the matter to the satisfaction of the alleged victim of the harassment, he/she may embark on the formal procedure.

### **6.2. Formal Process**

The alleged victim of the harassment reserves the right to elect to embark on a formal procedure without having attempted to resolve the matter informally. Participants wishing to follow a formal procedure should follow the process as outlined below:

#### **6.2.1. Reporting**

Participants directly affected by harassment as well as witnesses are encouraged to report incidents of harassment at a TI-S organised event/meeting. Witnesses are first urged to speak to the alleged victim and support the person to report the incident or ensure that that person is comfortable with the incident being reported by the witness or by an individual they trust that is also present at the event. However, witnesses should feel empowered to report cases in confidence even without the consent of the alleged victim, in order to bring violations to the attention of the event/meeting organisers and help ensure the safety of all event participants. The Review Panel is responsible for ensuring that no actions are taken without the expressed consent of the perceived harassed person.

### **6.2.2. Contact point**

Ideally, for each event the number of contact points should equal the number of days of duration of the event.

Contact points will be appointed on the basis of their capacity to effectively handle such sensitive issues as follows:

- For AMM by Managing Director following recommendation by Governance Director.
- For IACC by IACC Series Director.
- For Regional Meetings by respective Regional Director.
- For other TI-S organised events in Berlin by the responsible Group Director.
- For TI Board Meetings by the Governance Director.

All selected Contact Points should receive adequate training in order to carry out their function.

At the beginning of the event, the organiser must have informed all participants about the available means (i.e. email, mobile phone number etc.) to report cases of harassment to a designated contact point. The event/meeting organiser ensures a 24h-availability of the contact point during the event. Participants should report incidents to the contact point promptly by using the available contact means. If reporting to the contact point is perceived as a conflict of interest, participants can contact a member of the Review Panel directly.

The contact point may be also approached by any participant and person involved in the organisation and implementation of the meeting/event for advice regarding a perceived case of harassment. In this case, the receipt of advice from the contact point does not necessarily constitute a formal reporting of the incident.

### **6.2.3. Initial meeting**

The contact point will immediately get back to the complainant and invite them to a neutral and private space to receive more information about the complaint. The interview will be based on a standardised questionnaire (see FAQs, page 10) to capture information relevant for the assessment of the complaint. If demanded by the complainant, the initial meeting and provision of information can take place on the phone.

Upon permission by the complainant, the contact person immediately notifies the Review Panel and hands over the information received during the initial meeting. The Review Panel will convene latest within 24 hours to review the case details and decide on the next steps. The contact point will provide advice to the Review Panel if requested.

## **6.3. Investigation and decision-making process**

### **6.3.1. Review Panel**

The Review Panel is the investigatory body which looks into any harassment complaint received during the meeting/event. It should consist of three individuals, ideally one representative of TI-S Directors, one representative of TI-S staff and one participant. The TI-S Director and the TI-S staff representatives are appointed by the MD for one year. The participants' representative should be from the National Chapter in the host country, and is appointed based on recommendation from the NC in the host country by the event organiser. In case the event takes place in a country where TI has no presence the event organiser will appoint a participants' representative. Members of the Review Panel should be appointed based on their capacity to effectively handle such sensitive issues, and additional training should be provided as necessary. The composition of the Review Panel must be declared and its members as well as contact channels announced in advance of the event.

### **6.3.2. Investigation process**

Given the brevity of an event, the investigation process will start within 24 hours of a complaint having been received by the Review Panel and if at least one member of the Review Panel deems the complaint worthy of investigation. Ideally a complaint should be reviewed and appropriate decision made within 48 hours.

A member of the Review Panel will contact in confidence the respondent - the person accused of harassment - and inform them that a complaint has been received. The Review Panel will give the respondent the possibility to respond to the allegation and presenting their version of the events. If the respondent denies the accusation or if the offence is considered severe enough by the Review Panel to warrant immediate further exploration the investigation proceeds.

If deemed necessary the Review Panel will schedule in confidence individual interviews with the complainant, the respondent and/or with witnesses named by the complainant or respondent.

All parties involved are expected to cooperate with the Review Panel members in confidence and provide information on request. This might include that any of these parties are pulled from their intended or scheduled activities at the event as deemed necessary in order to conduct the investigation.

### **6.3.3. Decision-making process**

Based on the information gathered during the investigation, the Review Panel will consult and come to a decision by majority vote. Possible outcomes of the investigation process are:

- The complaint is not upheld and will thus be dismissed.
  - If deemed to have been lodged in good faith the complaint is closed and no further action taken.
  - If deemed malicious, with the intent of defaming the respondent, the Review Panel will decide on resulting responses and, if deemed appropriate, sanctions against the complainant including potentially to the Chair/ the Board of the complainant's National Chapter in the case of participants attending in a Chapter capacity.
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- The complaint is upheld. The Review Panel will decide on the severity of the complaint, on resulting responses and, if deemed appropriate, sanctions.
  - If the complaint is found to be so serious that it should be referred to the competent law enforcement authorities, the Review Panel will provide support to the complainant during the reporting process.
  - If the complaint is found justified but less severe the Review Panel decides on appropriate internal sanctions, and communicates these in writing and orally to the complainant and the respondent.).

In all cases the Review Panel will inform all parties involved about its decision in writing and file all information gathered during the investigation process in a case log. During this decision making process it is particularly important that all parties involved respect the principles set out in paragraph 7 of this policy.

## **7. Responses and sanctions**

Non-compliance with this policy can result in responses and sanctions up to and including expulsion from all TI-S-organised events. Serious cases of harassment can furthermore

result in reporting to relevant law enforcement authorities. The responses and sanctions intend first and foremost to prevent substantiated cases of harassment from recurring. This might include responses and sanctions with an effect beyond the end of a meeting/event.

As soon as a final decision was announced by the Review Panel, all parties involved are expected to comply with the decision and, if relevant, imposed responses and sanctions.

The Review Panel has the right to enforce the responses and sanctions with immediate effect.

In the case of repeated substantiated complaints against a participant of TI-S events/meetings, the individual may face expulsion and be barred from participating in further events/meetings.<sup>3</sup>

**Note: Responses/corrective actions/sanctions should be based on a decision by majority vote and should be appropriate meaning:**

- based upon the circumstances.
- taking into account the nature and severity of the case.
- taking into account the potential or actual harm caused by the policy violation.
- aiming to stop the harassment immediately as well as in the future.

**Advisory discussion with the respondent.** Depending on the severity of the concern raised, the Review Panel may choose to have a direct conversation with the respondent, informing them that a complaint has been received about their conduct, naming the conduct in question and politely but firmly stating 'Please do not do that again'.

**Written warning.** The Review Panel may choose to issue a written warning, notifying the respondent about the conduct which must cease, and reminding them that further sanctions could apply if the behaviour does not end immediately. A written warning should usually come only after the Review Panel has already conducted an advisory discussion with the respondent (see above), and would likely be triggered by the offensive behaviour being repeated after that advisory discussion.

**Mediated meeting of involved parties.** The Review Panel can decide to arrange a meeting between the complainant and the respondent with the aim of allowing the two parties to discuss the incident and agree a way forward. This approach may allow less severe cases of harassment to be acknowledged and discussed in a format akin to counselling, without the resort to more serious sanctions. The complainant must agree to the use of this response, and cannot be forced into such a meeting against their will. A mediated meeting could also be useful in the event that a complaint is dismissed, as a means to explain that decision to both the complainant and respondent.

**Separation via 'restraining order'.** If the Review Panel feels it necessary or useful, it can opt to separate the complainant and respondent by informing each that a temporary 'restraining order' is in place until further notice. This would mean that these individuals should avoid any close contact such as being in the same small-group settings (break-

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<sup>3</sup> In the case of the AMM, Chapters' voting rights will not be affected by the application of this policy.

out sessions, committee meetings, panels and workshops, social activities); likewise, communication via email, phone, SMS and other means should be avoided during this period. The purpose of the separation is to provide an initial space for the investigation to proceed while also preventing the possibility of a repeat offence.

**Suspension from the TI-S organised event.** When the Review Panel determines that a complaint is substantiated, it may opt to suspend the respondent from aspects of the ongoing event. For instance, the respondent could be suspended from key speaking opportunities, social activities or group meals at the event, but still be allowed to attend the overall event.

**Expulsion from the TI-S-organised event.** When the Review Panel determines that a complaint is substantiated, it may opt to immediately expel the respondent from the event, at the respondent's (or respondent's organisation's) own expense. Expulsion would typically be applied in serious cases, where the continued presence of the person who has committed the offence poses the potential for harm to the complainant or witnesses. Likewise, a complainant who is found to have knowingly filed a false claim against another person may face expulsion at their own (or their organisation's own) expense. In practice, expulsion means the expelled party must leave the event venue and take no further part in any of its proceedings; if the expelled party's accommodation is on site at the event venue, the Review Panel may also require the person to arrange new accommodation away from the venue. The precise parameters of the expulsion are at the discretion of the Review Panel. An appeal over the recovery of costs associated with the expulsion can later be lodged with the Board Ethics Committee.

**Referral to appropriate authority at the offender's employer.** In some cases, the appropriate sanction may be best applied by the organisation where the person found to have committed the offence is employed – this could be the Secretariat, a national chapter, or even an external organisation. In these cases, the Review Panel would convey their evidence, findings and recommendations to the relevant authority at the respondent's employer (this might be their board, their executive director, an ethics body, or other complaints-handling body). In order for the Review Panel to refer the full case details onward to the respondent's employer, it must have the complainant's consent; without complainant's consent, the Panel can only inform the respondent's employer generically and without providing details or names, along the lines of 'We had a case of misconduct about your employee and have dealt with it according to this policy'.

If the complainant prefers, the Review Panel may assist the complainant in lodging a complaint with the appropriate authority at the respondent's employer. In either of these situations, the Review Panel should follow up to ensure that the offender's employer engages with the case and acts accordingly. Resorting to this sanction does not preclude the Review Panel from imposing other sanctions during or after the event.

**Addition of offenders to 'three strikes' log.** When a complaint is substantiated by the Review Panel, the misconduct of person(s) adjudged to have committed the offence will be logged in a central, confidential record at TI-S by the Ethics Advisor. To effect this, the Review Panel submits their final case file to the Ethics Advisor for central storage, and the Ethics Advisor enters select details in the log (the name of the offender, and a

general description of the offence along with its date and location; the log should not mention the complainant's name). When any individual receives 'three strikes' in the log (meaning, three substantiated complaints against them), the Ethics Advisor informs the TI-S Managing Director of this fact. The Managing Director will then pre-emptively inform that individual's employer or manager that the individual is henceforth not permitted to attend TI-S-organised events

**Referral to local/national authorities.** In certain severe cases where the offence violates applicable local/national laws in the event host country, there may be an obligation to refer the case to the local authorities (such as police). This would typically occur in cases that involve physical or sexual assault, or other criminal behaviour. The Review Panel's role in these scenarios is to support the complainant in reporting the case to the authorities. The Review Panel cannot refer the matter to the authorities itself.

## 8. Appeal

The complainant as well as respondent has the right to appeal against a decision made and/or sanctions imposed by the Review Panel. In case any of the parties involved express their intention to appeal against the decision by the Review Panel, the Transparency International Board Ethics Committee (=> contact details) can be called upon as a final appeal instance. On each request, the Board Ethics Committee should receive (a) a statement of the issues to be considered, (b) a summary of the relevant facts and copies of any pertinent documents, and (c) in cases where a particular urgency exists, a substantiated indication to that effect.

## 9. Documentation/Case-log

The Review Panel has the responsibility to document the information received, actions taken and decisions made during the whole investigation process. It is the Review Panel's responsibility to refer this information for archiving purposes as soon as possible after the event to the TI-S Ethics Advisor who is bound by confidentiality according to the TI-S Code of Conduct and who will file this information in a case-log. The TI-S Ethics Advisor will regularly check the case log regarding repeated actions of harassment by individual participants. In the case that a TI-S meeting/event participant was charged with three substantiated incidents of harassment, the TI-S Ethics Advisor will inform TI-S Management in order to initiate appropriate actions.

## 10. Review process

This policy will be reviewed on a regular basis. Feedback is welcome and should be directed to the TI-S Anti-Harassment Working Group<sup>4</sup> in writing ([eventguidelines@transparency.org](mailto:eventguidelines@transparency.org)).

## 11. Annex

FAQs to Anti-Harassment Policy for TI-S Organised Events and Meetings

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<sup>4</sup> The TI-S Anti-Harassment Working Group consists of two Works Council members, the TI-S Ethics Advisor, one member of the TI-S IACC Department, one member of the Governance Unit, and one member of the HR Department.

## **FAQs TO ANTI-HARASSMENT POLICY FOR TI-S ORGANISED EVENTS AND MEETINGS**

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## Definitions

### What is discrimination and (sexual) harassment?

In an organization as diverse as TI, individuals will have different views about what is offensive. TI's commitment to a discrimination- and harassment-free meeting and event environment, however, does not allow any cultural value or practice to legitimize behaviour which harasses, intimidates, threatens or humiliates others.

**Discrimination** occurs where a person has been treated directly or indirectly less favourably or would be treated less favourably than compared to another person because of their actual or perceived race or ethnic origin, gender, religion or belief, disability, age or sexual orientation or other aspects of one's identity.

**Harassment** occurs when an unwanted conduct takes place with the purpose or effect of violating the dignity of the person concerned and of creating an intimidating, hostile, degrading, humiliating or offensive environment because of a person's actual or perceived race or ethnic origin, gender, religion or belief, disability, age or sexual orientation or other aspects of their identity. **Sexual harassment** occurs when the unwanted conduct is of a sexual nature, typically an "unwelcome" sexual advantage.

Discrimination and (sexual) harassment may involve people of the opposite or the same sex. It may be part of a pattern of behaviour or occur only once. It may be directed at an individual or at a group of people. It may take place during face to face contacts, but can also be inflicted by means of telephone calls, letters or e-mails. Most seriously, it may involve abuse of authority.

Determining whether someone's conduct amounts to discrimination or (sexual) harassment requires consideration not only of their intent but also of the perception of their behaviour by others. An action may be discriminatory or harassing, whether intentional or not, if somebody else found it offensive or intimidating. Another important element is the extent to which the conduct interferes with the meeting and event atmosphere. Mildly offensive comments or behaviour can rise to the level of discrimination and harassment if they are repeated or have become pervasive. At the same time, a single incident will be considered discriminatory or harassing if it is so severe that it poisons the overall environment.

# General questions for meeting participants

## 1. How am I expected to act in TI organized events?

Every participant should feel welcome, comfortable and safe at a TI-S-organised event as well as feel responsible for other participants to feel the same.

The key principles that should guide your participation are:

- **Respect:** Timeliness and engaged participation until the meeting ends will benefit all participants and positively contribute to the outcomes of the meetings.
- **Collegiality:** All participants will benefit from an insightful and supportive meeting environment. In lieu of spontaneous interventions, a raised hand will signal that a participant would like to talk.
- **Who is talking?** Indicating your name and affiliation with TI (Chapter, Individual Member, Board of Directors or Advisory Council) or any other organisation/company etc. will facilitate the communication and exchange of participants.
- **Understanding each other:** Be aware that the official meeting language is not necessarily the mother tongue of all participants. While interpretation services might be provided, speaking clearly, loudly and slowly will make it easier for participants not fluent in your language to understand your intervention and will allow time for appropriate interpretation.
- **Clarity:** Clear and concise interventions will support a lively and equal ground for exchange.
- **Tolerance:** It is important to bear in mind that humour may, particularly in a culturally-diverse context, hurt participants, even if the speaker did not intend it to be. A TI-S event is a space for everyone to express themselves in a gentle and cordial environment.

## 2. What is TI doing to prevent harassment?

TI takes a strong stance against harassment of all nature in the workplace. TI's position on discrimination and (sexual) harassment is clear: zero tolerance! Strict adherence to the Code of Conduct, an Ethics structure both at Secretariat and Board level, and this Anti-Harassment Policy are but a few ways though which TI seeks to address this. Through this policy and the Grievance Policy, TI seeks to maintain fair procedures for dealing promptly with complaints from employees.

All participants and further stakeholders will be informed about the Anti-Harassment Policy and the resulting rights and responsibilities both before and during the TI-S organised events.

## 3. Does the policy also cover harassment outside the event/meeting place?

Generally, a TI-S organiser will not intrude or become involved with the private lives of employees or event/meeting participants. However, TI-S staff as well as participants may be viewed as event/meeting representatives even when outside of an event/meeting place if there is a report or complaint of harassment and the activity has a nexus to the event/meeting (i.e. the incident happened at an event/meeting-related site or social event).

#### **4. What do I do if I experience or witness harassment?**

- Often, the most effective method to put an end to harassment is to tell the person to stop. Let the person know the action is unwelcome. Ignoring the situation will not make it go away!
- However, do not directly approach the offender, when there have been threats or threatening behaviour.
- If the direct approach is not appropriate or does not solve the problem, report the situation to the “Contact Point”.

## **Questions for organisers**

### **1. What actions should I take as a meeting organiser before the event to prepare for my role under this policy?**

- Acquaint yourself with the Anti-Harassment Policy and in particular with the complaints handling procedure.
- Assign the roles of the “Contact Point(s)” to a TI-S staff member(s) as well as of the members of the Review Panel to TI-S staff members and/or event/meeting participants present at the planned event/meeting and make sure that they are easily to contact and available during the event. Secure their contact details during the event (e.g. mobile number, email address, room number etc.)
- Organise a briefing session on the Policy and guidelines for TI-S event/meeting organisers for all involved TI-S staff members (if possible already include the “Contact Point(s)” as well as the members of the Review Panel).
- Inform the participants in particular about the provisions of the policy, their important role in implementing the policy, the planned actions for informing participants about the policy, the complaints process, the main contact persons for receiving reports (i.e. “Contact Point(s)” and member of the Review Panel).

### **2. What do I need to consider when assigning the roles of the “Contact Point(s)” and of the Review Panel members?**

- If possible, pick people who are already somewhat familiar with the issue of harassment and/or handling complaints and ethical issues.
- Keep the number of “Contact Points” as small as possible taking into consideration working hours, involvement into the event/meeting programme etc. Possible arrangements are for example: 1 “Contact Point! + 1 Back up or 2 “Contact Points” who can be contacted alternatively.
- Take into account a gender balance in the composition of the Review Panel as well as with the selection of “Contact Points”.
- Do assign these roles to experienced staff members and/or participants ideally at a senior level including relevant stakeholder of the event/meeting (depending on availability e.g. senior staff of TI-S + NC representative + IM).
- Secure cooperation of people for the Review Panel in advance. Explain the objectives of the panel as well as the rights and responsibilities resulting from this position during the event/meeting. Do not force people to take over the position!

- You might consider some quick role-playing. Practice helps to react to unexpected and sensitive situations.
- Avoid any conflicts of interest in the composition of the Review Panel. Conflicts of interest should be declared by the Review Panel members when they occur. If necessary, a (temporary) substitute needs to be assigned.

### **3. What actions should I take as a meeting organiser before the event to promote the policy?**

- Integrate a reference to the Anti-Harassment Policy into your communication of the event/meeting, e.g. as a disclaimer in your emails and a reference in the invitation
- Publish the Policy on the event/meeting website or Chapter Zone.
- Inform other stakeholders (e.g. service providers) about the Policy and request compliance.
- Organise a briefing session for the “Contact Point(s)” and members of the Review Panel to inform them about their role, rights and responsibilities and make the “Contact Point(s)” acquaint with the standard complaints questionnaire for receiving complaints.

### **4. What actions should I take as a meeting organiser during the event?**

- Distribute the Anti-Harassment Policy in the event/meeting folder.
- Ensure that all participants explicitly accept the Policy.
- Distribute the short version (business card format) to participants.
- Display of policy at the registration desk.
- Organise a mandatory information session for all participants at the beginning of the event.

## **Questions for “Contact Points” and members of the Review Panel**

### **1. General principles**

- Any allegation of harassment must be addressed **promptly** and steps taken immediately to ensure the personal security of all involved. Timelines must be designed for the quick resolution of the complaint and communicated to the parties involved.
- Assess whether it is **appropriate** for the Review Panel to investigate the case or – in the case that the harassment case filed is violating (local) laws if it should be reported to the local authorities immediately by the complainant.
- All people involved in the harassment case **must be treated fairly**. Both parties (complainant and respondent) should be kept informed of the status of any investigation. Retribution or retaliation against the person making the complaint or against anyone who assists the investigation cannot be tolerated. Any attempt to influence or obstruct any of the parties involved in the case is a complainant or an alleged harasser is victimisation and unacceptable.
- All harassment complaints will be **impartially investigated**. The Review Panel must be comprised of people with no links to the complainant or the respondent.

- All complaints must be treated confidentially throughout the reporting and investigation process. Any person aware of the complaint and/or involved in the investigation must **respect strict confidentiality**. All information shared in the course of the complaint should be kept confidential and should not be released unless the Review Panel finds it necessary and the complainant agrees to it.

## **2. How am I expected to handle cases of harassment as “Contact Point”?**

- Find a neutral and/or private space for the initial meeting with the complainant.
- Listen to the complainant and gather the facts by using the **standard complaints questionnaire** without criticizing, judging or questioning their truthfulness.
- Provide advice if requested.
- Inform the complainant/witness about the rights and responsibilities of all parties involved and explain the complaints investigation process (incl. timelines) defined by the Policy.
- Refer the case and give the information to the Review Panel.

## **3. How am I expected to conduct an investigation as member of the Review Panel?**

- Investigate immediately. Delaying or extending an investigation can make witness testimony increasingly unreliable or impossible due to the limited duration of an event/meeting.
- Remember that the manner in which the investigation is handled can itself furnish grounds for complaints, so carefully document every step.
- Treat all claims seriously until you have reason to do otherwise.
- Update all parties involved regularly on the planned steps as well as the status of the investigation process.
- Keep the investigation confidential and request confidentiality from all parties involved. Emphasis to those involved that your discussions and information shared are not to be shared with unconcerned parties. Warn of possible disciplinary action, if necessary.
- Limit the number of persons who have access to information. Communicate strictly on a “need to know” basis, i.e. only share as much information as necessary.
- Ask questions so that information is not unnecessarily disclosed. *For example, instead of asking, “Did you see person 1 touching person 2?” ask “Did you witness any behaviour you would consider inappropriate between person 1 and 2”.*
- Remember – the purpose of the investigation is to gather facts, not disseminate allegations.
- If there is more than one allegation, treat each separately.
- To avoid defamation liability, never broadcast the facts of a given situation or the results as an example to others.

## **4. How am I expected to interview the complainant as member of the Review Panel?**

- Get specific details based on the initial information provided by the “Contact Point” and if necessary, seek clarification.
- Find out whether there was a pattern of previous episodes or seminal behaviour toward another participant.

**5. How am I expected to interview the responded as member of the Review Panel?**

- Present the complaint to the responded. Only stick to facts and communicate strictly on a “need to know” basis.
- Inform the respondent about their rights and responsibilities and give them the possibility to respond to the allegation and presenting their version of the events.
- Obtain a statement from the responded.
- Identify the relationship of the responded to the complainant (e.g. direct line-management relationship).
- Describe the details of the allegation and note the areas of disagreement between testimonies of both parties.

**6. How am I expected to interview the witness as member of the Review Panel?**

- Obtain statements from any witnesses who support or deny any of the complainant’s allegations. Be aware that witnesses are often reluctant to come forward out of fear of reprisal.
- Assure all witnesses that their cooperation is important and that their testimony is confidential.

Annex 1

## Standard Complaints Questionnaire

### **STANDARD COMPLAINTS QUESTIONNAIRE**

- *What happened? What is the nature of the complaint?*
- *Who was involved? Who is alleged to have perpetrated the harassment? Are there any witnesses?*
- *Where and when did the incident occur? Prepare a detailed chronology.*
- *Does the complainant feel impending threat of repeated offense (is immediate action required)? What are the complainant's proposed remedies, if any?*
- *Do I have your permission to share this report with the Review Panel so they can launch an investigation?*