Policy Title Anti-harassment Policy			Number: 1101
Approved Date: 05/06/2021	**Effective Date:** 05/06/2021	**Review Date:**	**Review Responsibility:** Chairperson - Integrity & Ethics
Authority: Article II, Section 1 and Article VII, Section 1, Association of Inspectors General Articles of Organization, Constitution and Bylaws			
Related Documents:			

I. Purpose

The Association of Inspectors General anti-harassment policy expresses our commitment to maintain a workplace that's free of harassment, so our employees can feel and work in a safe environment. We will not tolerate anyone threatening, intimidating, humiliating or sabotaging others in our workplace. We also prohibit willful discrimination based on age, race, gender identification, sexual orientation, ethnicity, religion or disability.

II. Scope

This policy applies to all employees, board members, volunteers, contractors, visitors, Institute® or training attendees, instructors or presenters, stakeholders and anyone else whom employees come into contact with at work. "Work" for the purposes of this policy shall include, but is not limited to, any actual or virtual office setting, all Institute® program locations, any training conference location and all virtual environments (e.g., WebEx or Zoom meeting rooms or Teams environment.)

III. Definitions

a. **Harassment** includes threatening, bullying, intimidation, direct and indirect insults, malicious gossip and victimization.

We can't create an exhaustive list, but here are some instances that we consider harassment:

- Intentionally sabotaging someone's work.
- Engaging in frequent or unwanted advances of any nature.
- Commenting derogatorily on a person's ethnic heritage or religious beliefs.
- Starting or spreading rumors about an individual's personal life.
- Ridiculing someone in front of others or singling them out to perform tasks unrelated to their job (e.g. bringing coffee) against their will.

b. **Sexual harassment** is any verbal, non-verbal, physical or psychological assault or harassment explicitly or implicitly suggesting or involving a sexual connotation. (See also. AIG Sexual Harassment Prevention Policy.) Sexual harassment is illegal and all reports of sexual harassment will be investigated and, if appropriate, reported to the law enforcement agency with jurisdiction to investigate the matter. If an employee is found guilty of sexual harassment, they will be disciplined up to and including termination. Any physical sexual assault or attempted physical sexual assault shall result in termination.

IV. Reporting Sexual Harassment

If you're being harassed, by anyone, you can choose to talk to any of the people below. You are not required to speak to offenders or managers and may go directly to the Executive Director or Chairperson of the Integrity & Ethics Committee.

- **Offenders.** If you suspect that an offender doesn't realize they are guilty of harassment, you could talk to them directly in an effort to resolve the issue. This tactic is appropriate for cases of minor harassment (e.g. inappropriate jokes between colleagues.)

- **Your manager**. If customers, stakeholders or team members are involved in your claim, you may reach out to your manager. Your manager will assess your situation and is required to consult with the Executive Director to address/resolve the claim.

- **Executive Director**. Feel free to reach out to the Executive Director in any case of harassment no matter how minor it may seem. For your safety, contact the Executive Director as soon as possible in cases of serious harassment (e.g. sexual advances.) Anything you disclose will remain confidential.

- **Integrity & Ethics Committee Chairperson**. In the event that your claim involves the Executive Director or a Board member, then you should contact the Chair of the Integrity & Ethics Committee.

V. Processing of Complaints

a. All complaints of sexual harassment, regardless of type shall be documented and processed as provided in this section.
b. Complaint submitted to the Executive Director
    1. The Executive Director shall detail the allegations in writing and forward a copy to the Chairperson of the Integrity & Ethics Committee for review.
    2. The Executive Director will immediately take all reasonable steps to eliminate the potential of further physical or psychological harm to the complainant. Any action (or non-action) shall be annotated in the report generated by the Executive Director. If no action is taken, an explanation must be included in the report.

3. The Executive Director and Chairperson shall consult with each other, review the complaint and determine the level of severity of the allegation(s). The Chairperson shall determine who will investigate the complaint based upon the severity level of the allegation(s). Lower severity, first offenses, or non-physical violence allegations may be assigned to the Executive Director for investigation. Moderate severity, second offenses, or non-physical violence offenses may be, at the discretion of the Chairperson, assigned to the Executive Director for investigation. All other offenses must be investigated by the Integrity & Ethics Committee. (See subparagraph "c", Complaint submitted to Chairperson of Integrity & Ethics Committee.)
4. Should the complaint involve a potential criminal offense, the complainant will be provided assistance or support in making a report to the appropriate law enforcement agency.
5. The Executive Director shall investigate the allegations and document the findings in a written report and make a recommendation of disposition. The report and recommendation shall be forwarded to the Chairperson of the Integrity & Ethics Committee. The Chairperson may concur with the recommendation, modify the disposition upward or downward in severity, or determine that additional investigation is needed.
6. In the event additional investigation is needed, the Chairperson may delegate the additional investigation to the Executive Director or to a committee member. Any additional investigation will serve as a supplement to the original report.
7. Upon completion of the original and any supplemental reporting, the Chairperson shall review the file and make a determination of disposition.

c. Complaint submitted to Chairperson of Integrity & Ethics Committee
   1. A complaint submitted directly to the Chairperson of the Integrity & Ethics Committee shall detail the allegations in writing.
   2. The Chairperson will immediately take all reasonable steps to eliminate the potential of further physical or psychological harm to the complainant. Any action (or non-action) shall be annotated in the report generated by the Chairperson. If no action is taken, an explanation must be included in the report.
   3. The Chairperson shall take responsibility for the investigation or assign the matter to a member of the committee, provided the committee member is an elected member of the Board of Directors.
   4. The Chairperson will brief the Association's President of the complaint and ongoing investigation.
   5. The Chairperson or assigned committee member, when assigned, shall conduct the investigation and document their findings and recommendation for disposition. A copy of the completed report shall be provided to the President of the Association.

6. The Chairperson and President of the Association shall confer and determine the appropriate disposition.

d. To the extent possible, the name(s) of the complainant will not be released or disclosed without first notifying or obtaining the consent of the complainant. Nor will information be released that could reasonably lead to the identification of the complainant.
e. All reports, interviews, and evidence collected shall be confidential and shall not be released without the lawful issue of legal process or court order.

VI. Disciplinary Consequences

The primary objective of disciplinary consequences under this policy are (1) to immediately effectuate the cessation of the harassing conduct, (2) to make the workplace a safe place to work free of harassment of any kind, (3) educate and/or train the offender to recognize and cease the harmful conduct, and (4) to punish recidivists up to and including termination.