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## URGE Complaints and Reporting Policy for IRIS/UNAVCO+ Pod

This is what was found by IRIS/UNAVCO+ Pod on policies for handling complaints, the reporting process, resources, and possible outcomes. Some information was public; answers that were only found through follow up with contacts are noted.

Take away points from discussion of the findings:

- Both organizations have the standard HR approach to reporting policies, with anything beyond this largely not written down and taken on a case-by-case basis
  - This is not sufficient or effective, leaving room for improvement
- We could augment standard legal policy with written guidelines that can be used to improve the culture and outline a more productive response to reported issues
- Large-scale changes in our field can benefit from the power held by funding agencies like NSF, and by the broad interactions or tracking done by organizations like AGI

ORANGE TEXT ARE EXAMPLE ANSWERS TO BE FILLED IN

## UNAVCO

Note - Blue text is HR response.

- **The link(s) to the reporting policy at our organization are here:**
  - *Located on Confluence - Human Resources Employee Handbook and Employee Complaint Forms -*  
*Internal on Confluence HR page, need password/vpn access.*
- Are reporting policies regularly reviewed? What is the process for changing policy?  
*An employee grassroots effort led safety changes over the last 2 years through committee focused discussion and action. A model for future change in policy.*  
*HR - The Employee Handbook is reviewed annually and updated as regulations, laws or internal policies are needed.*  
*Policy change requests are submitted to HR for review and referred to the Senior Management Team for review, update recommendations and final issuance.*  
*Note - There is an issue w/ reporting vendors. Tracking complaints does not exist and these vendors can be rehired. At risk employees are not warned. When dealing with such vendors the warning is word of mouth from at risk*

*employees to other at risk employees. No manager support.*

- Are the rates of reporting made publicly available (e.g. # of reports each year)?  
*HR - All complaints remain confidential to the extent possible to complete an inquiry, internal or external investigation.*
- **What mechanisms are available for reporting complaints, bias, microaggressions, harassment, and overt racism?**
  - Who are the designated individuals/positions for reporting incidents?  
*Managers. It varies w/ manager if they take a complaint seriously. Have the option to bypass and report to an upper manager and/or HR. Note - contacting HR has been historically discouraged.*  
*HR - Every employee is responsible for refraining from these behaviors. When these behaviors are present within the workforce, any staff involved with, witnessing or has knowledge of is required to report these behaviors immediately to HR, their supervisor/Director or the President.*
  - Can reports be made online? Where? **Yes** **Link** Anonymously? **Yes**  
*Forms located on the internal HR Confluence page. The employee fills them out and passes them onto their manager. The manager signs it and passes it to HR, who shares w/ upper management/directors/president. All links are internal (need password and vpn access).*  
*There is an on-line anonymous suggestion box. It's internal, needs VPN and account access. One can select if it goes to President, HR, and/or BA. Example - It was used a few years ago to report an incident by many employees in the company.*  
*HR - Reports of inappropriate behavior can be made in person with HR, reported in writing through the Employee Complaint Forms, or submitted (anonymously or not) through UNAVCO's Suggestion box email.*
  - Who do in-person and online reports go to? Who has access to see reports?  
*HR - On-line reporting is based on the reporter of the incident, these reports can be sent to HR, the President, and/or the Director of BA. In person reports should be submitted to HR; however, staff can also report inappropriate behaviors to their supervisors/Directors or the President. See Employee Handbook*
  - Are police included in the process? When and how? Are individuals accompanied by an advocate or someone from the organization?  
*Police reports are advised when an incident happens in the field.*

*Example by Liz VB - Verbally harassed/threatened this summer (2020) in central OR. Approached by a man identifying as a nazi, harrassed, and told to die. I reported to my manager, filled out a "near miss form," and reported to the County police. HR responded w/ an e-mail reminder that TriNet provides counseling. No follow up. You advocate for yourself. Some more concerned staff checked in. It did motivate de escalation training for field staff. I'm unaware of what happens in the office setting.*

- **What are the outcomes or consequences for reported individuals?**
  - E.g. follow-up by supervisor, training (bias, etc.), disciplinary action, termination.  
*This is based on the circumstances and the outcome of an investigation and is at the discretion of the President.*
  - Who decides the outcomes/consequences? What is the process?  
*The President has the final decision as to the outcome and consequences. Depending on the situation, this may be an internal inquiry, an internal investigation or the process may be overseen by an external investigator.*
  - Are reports tracked? **Yes/No** How are they tracked? By who?  
*HR holds all documents created during the inquiry or investigation and the final resolution of the complaint.*
  - Are repeated complaints escalated to a disciplinary board? What is the process?  
*Not sure there have been any repeated complaints; however, the process would include an inquiry, internal or external investigation.*  
*There is no disciplinary board and to protect the complainant and responder, all complaints are kept as confidential as possible as part of the process.*
- **What resources are available for individuals reporting?**
  - Counselors or advocates, especially those of the same race, ethnicity, and gender.  
*Trinet Counseling, you get 2 free sessions and pick from a list of local options.*  
*Employee Assistance Program*
  - Automatic or requested investigation of potential impact on grades or evaluations.  
*No, not an option.*
  - Protection against retaliation or repercussions, accomodations for continuing work/courses, option for pass/fail or outside assessment.  
*Protection against Retaliation. Outside assessment/investigation.*  
*If a complainant or any individual who is involved with an inquiry or investigation is retaliated against, the individual or any individual with knowledge of this behavior is to report the incident immediately to HR or the President.*

- **What resources are available to groups raising issues or proposing changes?**
  - Petitions of # signatures trigger a town hall, meeting with organizational leadership, or policy change. What is the follow-up process for town halls and meetings?

*Can propose a committee, which might be approved by a director.*

*We are a very small organization. All staff have access to the President and HR to bring up issues within the workplace. Depending on the issues, they may be referred to the Senior Management team for resolution, HR of an inquiry or investigation or an outside investigator with final determinations being at the discretion of the President.*
  - Working groups or committees with power to change or propose changes to policy.

*Changes are advised by group committees focusing on a topic. They are not always turned to policy. Sometimes the results are advised to a director, but have no result and are kept private. Other times a committee has led to policy change, such as the safety committee.*

*Major review/updates to policies or procedures have been accomplished through the use of various committee efforts. Staff are encouraged to participate in committees and provide a voice for changes to policies and procedures.*
  - Cultural surveys, regular or only after wide-spread reports or high-profile incidents.

*No. IDEA committee working on cultural survey w/ IRIS. High-profile incidents typically result in training.*
  - Leadership proactively asks students and/or staff for input on how to improve.

*We are not an educational institution with students. However, staff are afforded opportunities through 1:1 meetings with the President, meetings with HR and with supervisors/Directors to discuss activities or issues which would improve UNAVCO's operations.*

*Depends on the manager. It varies from a manager that is open and receptive, to managers that do not want to hear about it. There is slow improvement as there is a push for culture change. In some cases improvement in working conditions is bottom driven when not directed from the top.*

# IRIS

- **The link(s) to the reporting policy at our organization are here:**
  - IRIS Reporting Policies  
*The IRIS **Employee Handbook** describes its reporting policy under sections*
    - *1-5 Harassment, Discrimination and Retaliation Prevention and*
    - *1-6 Workplace Violence.**The handbook is available for download online, but access requires authentication. Text for these sections are appended to the end of this document.*
  - Are reporting policies regularly reviewed? What is the process for changing policy?  
*IRIS' procedure for **Preparing, Reviewing and Approving IRIS Policies and Procedures** allows new or modified policies and procedures to be proposed at any time. They are reviewed prior to approval. IRIS reviews their employee handbook annually for compliance changes. All policies included in the handbook are reviewed as part of this process. Some IRIS policies will also be reviewed as we implement the **IRIS Anti-Racism Action Plan**.*
  - Are the rates of reporting made publicly available (e.g. # of reports each year)?  
*No.*
- **What mechanisms are available for reporting complaints, bias, microaggressions, harassment, and overt racism?**
  - Who are the designated individuals/positions for reporting incidents?  
*The **IRIS Employee Handbook** states that violent behavior should be reported immediately to any member of management. Nonviolent incidents should be reported to the employee's manager or supervisor. If they have not responded satisfactorily in five business days, reports should be made to the employee's second level supervisor. If the complaint is toward the employee's first- or second-level supervisor, the employee may report to any higher-level manager. Employees who are uncomfortable with this policy may alternatively contact IRIS Human Resources or ADP TotalSource MyLife Advisors. (ADP is IRIS' Professional Employer Organization, or PEO).*
  - Can reports be made online? Where? **No**, Anonymously? **No**

- Who do in-person and online reports go to? Who has access to see reports?  
*Every supervisor who learns of any employee's concern about conduct in violation of this policy, whether in a formal complaint or informally, must immediately report the issues raised to his or her manager or if the manager is the person toward whom the complaint is directed, the supervisor should contact any higher-level manager in his or her reporting chain. The manager informs HR of the complaint. HR gathers information relating to the complaint and requests a third-party investigation through ADP, if warranted.*
- Are police included in the process? When and how? Are individuals accompanied by an advocate or someone from the organization?  
*IRIS' policy does not address police involvement.*
- **What are the outcomes or consequences for reported individuals?**
  - E.g. follow-up by supervisor, training (bias, etc.), disciplinary action, termination.  
*Employees who violate the harassment, discrimination or retaliation policy, are subject to discipline up to and including termination.*
  - Who decides the outcomes/consequences? What is the process?  
*IRIS or ADP conducts an investigation, maintaining confidentiality to the extent possible. IRIS will*
    - *interview the complainant, the accused, and other necessary witnesses, and provide each with the opportunity to provide input*
    - *document the Company's findings regarding the complaint*
    - *document recommended follow-up actions and remedies, if warranted*
    - *inform the complainant of the Company's findings**Employees who violate the harassment, discrimination or retaliation policy, are subject to discipline up to and including termination.*
  - Are reports tracked? **Yes/No**      How are they tracked? By who?  
*What is meant by "tracking" here?*
    - *Maybe it means statistics in terms of counts and outcomes. (?)*
  - Are repeated complaints escalated to a disciplinary board? What is the process?  
*IRIS policy does not address procedures for repeated complaints.*
- **What resources are available for individuals reporting?**
  - **Counselors or advocates, especially those of the same race, ethnicity, and gender.**

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*In addition to speaking with IRIS human resources staff, complainants may contact advisors at ADP, IRIS' Professional Employer Organization (PEO). ADP also provides IRIS employees with access to free professional consultations regarding work, legal, personal and other matters.*

- Automatic or requested investigation of potential impact on grades or evaluations.  
*IRIS has a zero-tolerance policy toward retaliation.*
- Protection against retaliation or repercussions, accommodations for continuing work/courses, option for pass/fail or outside assessment.  
*Retaliation follows the same reporting and discipline procedures as harassment and discrimination.*
- **What resources are available to groups raising issues or proposing changes?**
  - Petitions of # signatures trigger a town hall, meeting with organizational leadership, or policy change. What is the follow-up process for town halls and meetings?  
*The IRIS Anti-Racism Action Plan invites groups raising issues or proposing changes to contact the Justice, Equity, Diversity and Inclusion (JEDI) working group.*
  - Working groups or committees with power to change or propose changes to policy.
    - *IRIS' JEDI working group*
    - *IRIS Human Resources*
    - *IRIS' Leadership Team and Management Team*
  - Cultural surveys, regular or only after wide-spread reports or high-profile incidents.  
*IRIS policy does not address this. However, IRIS JEDI is currently working on a plan for a DEI assessment that will result in a strategy to tackle areas where improvement is needed.*
  - Leadership proactively asks students and/or staff for input on how to improve.  
*The **IRIS Anti-Racism Action Plan** provides for ongoing opportunities for input and feedback.*



## Appendix

Sections 1-5 and 1-6 of the **IRIS Employee Handbook** that describe the reporting and review of harassment, discrimination, retaliation and workplace violence incidents are appended below.

### 1-5. Harassment, Discrimination and Retaliation Prevention

It is the Company's policy to prohibit intentional and unintentional harassment and discrimination of any individual by another person on the basis of any protected classification under applicable federal, state, or local law, including, but not limited to actual or perceived race, color, national origin, ancestry, sex (which includes pregnancy, childbirth,

breastfeeding and medical conditions related to pregnancy, childbirth or breastfeeding), gender, gender identity, and gender expression, religious creed, disability (mental and physical) including HIV and AIDS, medical condition (cancer and genetic characteristics), genetic information, age, marital status, sexual orientation, military and veteran status and denial of family and medical care leave.

Note that there is a wide range of what could be considered inappropriate behavior under this policy even though such behavior may not be considered illegal. For this reason, a violation of this policy may lead to disciplinary action whether or not it violates the law.

#### Sexual Harassment

It is IRIS' policy to prohibit harassment of any employee by any supervisor, employee, customer or vendor on the basis of sex or gender.

While it is not easy to define precisely what types of conduct could constitute sexual harassment, examples of prohibited behavior include all of the actions described below under "other harassment", as well as other unwelcome sexual advances, requests for sexual favors, obscene gestures, displaying sexually graphic magazines, calendars or posters, sending sexually explicit e-mails, text messages and other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments. Depending upon the circumstances, improper conduct also can include sexual joking, vulgar or offensive conversation or jokes, commenting about an employee's physical appearance, conversation about your own or someone else's sex life, teasing or other conduct directed toward a person because of his or her gender



which is sufficiently severe or pervasive to create an unprofessional and hostile working environment.

All such conduct is unacceptable in the workplace and in any work-related settings such as business trips and business-related social functions, regardless of whether the conduct is engaged in by a supervisor, co-worker, client, customer, vendor, or other third party.

### Other Harassment

Harassment as defined in this policy is unwelcome verbal, visual, or physical conduct creating an intimidating, offensive, or hostile work environment that interferes with work performance. Harassment can be verbal (including slurs, jokes, insults, epithets, gestures or teasing), graphic (including offensive posters, symbols, cartoons, drawings, computer displays, or e-mails) or physical conduct (including physically threatening another, blocking someone's way, etc.) that denigrates or shows hostility or aversion towards an individual because of any protected characteristic.

### Reporting Procedures

The following steps have been put into place to ensure the work environment at the Company is respectful, professional, and free of discrimination, retaliation and harassment, including sexual harassment. If you feel that you have been subjected to conduct which violates this policy, you should immediately report the matter to your Manager/Supervisor. If you are unable for any reason to contact this person, or if you have not received a satisfactory response within five (5) business days after reporting any incident of what you perceive to be in violation of this policy, please contact your second level Supervisor.

Note: If your Supervisor or next level Manager is the person toward whom the complaint is directed you should contact any higher-level Manager in your reporting chain.

Employees may also contact Human Resources or the ADP TotalSource MyLife Advisors at 800.554.1802 if they are uncomfortable for any reason using the above procedure.

Every supervisor who learns of any employee's concern about conduct in violation of this policy, whether in a formal complaint or informally, must immediately report the issues raised to his or her manager or if the manager is the person toward whom the complaint is directed, the supervisor should contact any higher-level manager in his or her reporting chain.

## Investigation Procedures, Corrective Action, and Prohibition Against Retaliation

Upon receiving a complaint, the Company will conduct a prompt, fair and thorough investigation into any claim of a violation of this policy.

All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed. The Company has a compelling interest in protecting integrity of its investigations. The Company may decide in some circumstances that in order to achieve these objectives, we must maintain the investigation and our role in it in strict confidence.

As part of the investigation, the Company generally will:

- interview the complainant, the accused, and other necessary witnesses, and provide each with the opportunity to provide input
- document the Company's findings regarding the complaint
- document recommended follow-up actions and remedies, if warranted
- inform the complainant of the Company's findings

All employees must cooperate with all investigations conducted pursuant to this policy.

The Company shall determine whether this policy has been violated based upon its reasonable evaluation of the information and credibility of witnesses gathered during its investigation. Upon completion of the investigation, the Company will take corrective measures against any person who has engaged in conduct in violation of this policy, if the Company determines such measures are necessary. These measures may include, but are not limited to, counseling, suspension, or immediate termination. Anyone, regardless of title or position, whom the Company determines has engaged in conduct in violation of this policy, will be subject to disciplinary action, up to and including discharge.

In addition, no employee will be subject to, and the Company will not allow, any form of retaliation against individuals who, in good faith, report unwelcome conduct, pursue any such claim, or cooperate in any way in the investigations of such reports in accordance with this policy.

If an employee believes someone has violated this no-retaliation policy, the employee should bring the matter to the immediate attention of his or her supervisor. If an employee is unable for

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any reason to contact this person, or if the employee has not received a satisfactory response within five (5) business days after reporting any incident of what the employee perceives to be in violation of this policy, the employee should contact his or her second level supervisor. If the employee's supervisor or next level manager is the person toward whom the complaint is directed the employee should contact any higher level manager in the employee's reporting chain.

Employees may also contact Human Resources or the ADP TotalSource MyLife Advisors at 800.554.1802 if they are uncomfortable for any reason using the above procedure.

Anyone, regardless of position or title, whom the Company determines has engaged in conduct that violates this policy against retaliation will be subject to discipline, up to and including termination.

We cannot remedy claimed violations of this policy unless employees bring these claims to the attention of management. Failure to report claims of harassment, discrimination and/or retaliation prevents us from taking steps to remedy the problem.

Employees who make complaints in bad faith may be subject to disciplinary action, up to and including discharge.

## **1-6. Workplace Violence**

IRIS is strongly committed to providing a safe workplace. The purpose of this policy is to minimize the risk of personal injury to employees and damage to Company and personal property.

We do not expect you to become an expert in psychology or to physically subdue a threatening or violent individual. Indeed, we specifically discourage you from engaging in any physical confrontation with a violent or potentially violent individual. However, we do expect and encourage you to exercise reasonable judgment in identifying potentially dangerous situations.

Experts in the mental health profession state that prior to engaging in acts of violence, troubled individuals often exhibit one or more of the following behaviors or signs: over-resentment, anger and hostility; extreme agitation; making ominous threats such as bad things will happen to a particular person, or a catastrophic event will occur; sudden and significant decline in work performance; irresponsible, irrational, intimidating, aggressive or otherwise inappropriate behavior; reacting to questions with an antagonistic or overtly negative attitude; discussing

weapons and their use, and/or brandishing weapons in the workplace; overreacting or reacting harshly to changes in Company policies and procedures; personality conflicts with co-workers; obsession or preoccupation with a co-worker or Supervisor; attempts to sabotage the work or equipment of a co-worker; blaming others for mistakes and circumstances; demonstrating a propensity to behave and react irrationally.

### **Prohibited Conduct**

Threats, threatening language or any other acts of aggression or violence made toward or by any Company employee WILL NOT BE TOLERATED. For purposes of this policy, a threat includes any verbal or physical harassment or abuse, any attempt at intimidating or instilling fear in others, menacing gestures, flashing of weapons, stalking or any other hostile, aggressive, injurious or destructive action undertaken for the purpose of domination or intimidation. To the extent permitted by law, employees and visitors are prohibited from carrying weapons onto Company premises except for employees at the Alaska location.

### **Procedures for Reporting a Threat**

All potentially dangerous situations, including threats by co-workers, should be reported immediately to any member of management with whom you feel comfortable.

Employees may also contact Human Resources or call the ADP TotalSource MyLife Advisors at 800.554.1802. Reports of threats may be maintained confidential to the extent maintaining confidentiality does not impede our ability to investigate and respond to the complaints. All threats will be promptly investigated. All employees must cooperate with all investigations. No employee will be subjected to retaliation, intimidation or disciplinary action as a result of reporting a threat in good faith under this policy.

If the Company determines, after an appropriate good faith investigation, that someone has violated this policy, the Company will take swift and appropriate corrective action.

If you are the recipient of a threat made by an outside party, please follow the steps detailed in this section. It is important for us to be aware of any potential danger in our offices. Indeed, we want to take effective measures to protect everyone from the threat of a violent act by an employee or by anyone else.