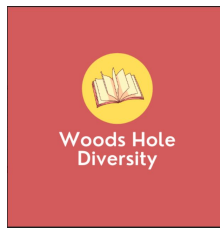


## URGE Complaints and Reporting Policy for (the) Woodwell Climate Research Center

This is what was found by the Woods Hole Diversity URGE Pod at the Woodwell Climate Research Center 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.

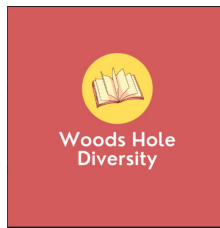
- **The link(s) to the reporting policy at our organization are here:**

- [Link](#) - Internal [website](#) with Employee Handbook
- Described in the Employee Handbook (organization-wide):
  - APPENDIX A – POLICY PROHIBITING ALL FORMS OF SEXUAL HARASSMENT
    - “Procedure for Complaints of Sexual Harassment
      1. Any employee who feels that they are the subject of sexual harassment or has witnessed sexual harassment should immediately report the incident, verbally or in writing, to Director of Human Resources or Deputy Director whenever possible. Formal or informal reports may also be made to the employee’s supervisor. All supervisory employees are required to report any complaints of sexual harassment to Director of Human Resources or Deputy Director.
      2. Director of Human Resources or Deputy Director shall immediately and thoroughly investigate all complaints of sexual harassment. The investigation may be performed internally or by an impartial third party from outside Woodwell Climate. In either case it will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances, and in a manner consistent with a fair and full investigation.
      3. Because we consider sexual harassment to be a serious matter, if it is determined that inappropriate conduct has been committed by one of our employees, we will act promptly to eliminate the offensive conduct and initiate disciplinary action where it is appropriate. Such action may range from counseling to termination of employment.
      4. In addition to filing a complaint with Director of Human Resources or Deputy Director, employees who believe they have been subjected to sexual harassment may file a formal complaint with appropriate state and federal government agencies listed below. Using Woodwell Climate’s complaint process does not prohibit employees from filing a complaint with these agencies. Each agency has a short period for filing a claim, and time limits for filing complaints are included below. Employees must exhaust their administrative remedies prior to filing a civil action.



5. This policy shall be distributed to each employee annually. This policy will also be provided to all new employees when they are hired. Additionally, a copy of this policy shall be available in Human Resources at all times.

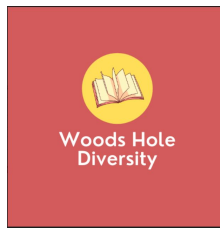
- APPENDIX B – PROHIBITION AGAINST HARASSMENT, DISCRIMINATION, ABUSE AND BULLYING BEHAVIOR
  - “Procedure for Complaints under this Policy
    1. Any employee who feels that they are the subject of discrimination, harassment, abusive behavior, bullying, or cyberbullying or has witnessed such activity should immediately report the incident, verbally or in writing, to the Director of Human Resources or Deputy Director whenever possible. Formal or informal reports may also be made to the employee’s immediate supervisor. All supervisory employees are required to report any complaints of discrimination, harassment, abusive behavior, bullying or cyberbullying to the Director of Human Resources or Deputy Director.
    2. The Director of Human Resources or Deputy Director shall immediately and thoroughly investigate all complaints of discrimination, harassment, abusive behavior, bullying, or cyberbullying. The investigation may be performed internally or by an impartial third party from outside Woodwell Climate. In either case it will be conducted in such a way as to maintain confidentiality to the extent practicable under the circumstances, and in a manner consistent with a fair and full investigation.
    3. Because we consider discrimination, harassment, abusive behavior, bullying, and cyberbullying to be serious matters, if it is determined that inappropriate conduct has been committed by one of our employees, we will act promptly to eliminate the offensive conduct and initiate disciplinary action where it is appropriate. Such action may range from counseling to termination of employment.
    4. In addition to filing a complaint with the Director of Human Resources or Deputy Director, employees who believe they have been subjected to discrimination, harassment, abusive behavior, bullying, or cyberbullying may file a formal complaint with appropriate state and federal government agencies. For the employee’s convenience, agencies are listed below. However, the list included may not be exhaustive, and the employee should conduct their own research with regard to filing a formal complaint with appropriate state and federal government agencies. Using Woodwell Climate’s complaint process does not prohibit employees from filing a complaint with applicable agencies. Each agency has a short period for filing a claim. For your reference, time limits for filing complaints are included below, and to the best of Woodwell Climate’s knowledge these



deadlines are accurate; however, employees are encouraged to conduct their own research to ensure that they do not miss a filing deadline.

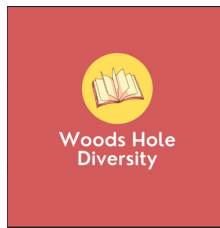
5. This policy will be provided to all new employees when they are hired. Additionally, a copy of this policy can be obtained from the Director of Human Resources at all times. Employees are encouraged to review this Policy annually.

- [Link](#) - Department, Lab, Division, Advisor or Supervisor Policies  
**None found**
- Are reporting policies regularly reviewed? What is the process for changing policy?
  - There is no stated process for changing the policy, but it would involve speaking with the Director of HR and then the Director of HR would then need to speak with Woodwell's contracted lawyers.
  - The Director of HR reviews the handbook annually in its entirety, and will continuously track and monitor employment legal changes as do the organization's employment attorneys. If there is a change in the law, the Director of HR will update the policy immediately, share the change with the Senior Management Team and post a revised handbook with a notification to staff.
- Are the rates of reporting made publicly available (e.g. # of reports each year)?
  - No
  - Complaints are reported to HR or the Deputy Director. All complaints are noted and placed in the employee's file.
- **What mechanisms are available for reporting complaints, bias, microaggressions, harassment, and overt racism?**
  - Complaint Procedure and Investigation (from Woodwell Employee Handbook, Appendix B)
    - Woodwell Climate will handle all complaints under this policy swiftly and confidentially to the extent possible in light of the need to take appropriate corrective action. Lodging a complaint will in no way be used against the employee or have an adverse impact on the individual's employment status. Because of the damaging nature of discrimination, harassment, abuse, and bullying of all forms to the victims and to the entire workforce, aggrieved employees are strongly urged to use this procedure. During the complaint process, the confidentiality of the information received, the privacy of the individuals involved and the wishes of the complaining person will be protected to as great a degree as is possible. The



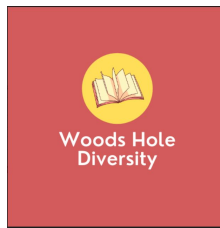
expressed wishes of the complaining person for confidentiality will be considered in the context of Woodwell Climate's obligation to act on the charge. Any employee who wishes to report a possible incident of unlawful harassment or discrimination or abusive behavior, bullying or cyberbullying in violation of this policy, may do so in one of several ways. They may informally or formally report the violation to their immediate supervisor or formally report the violation to the Director of Human Resources or Deputy Director. All employees in a supervisory role at Woodwell Climate must take seriously and report to Director of Human Resources or Deputy Director any potential violation of this policy no matter how "offhand" or informal the report of discrimination, harassment, abusive behavior, bullying or cyberbullying may be.

- Who are the designated individuals/positions for reporting incidents?
  - Director of Human Resources or Deputy Director
  - May also report to direct supervisors
- Can reports be made online? Where?
  - Reports can be made via email or in person (no link)
  - Reports cannot be made anonymously, but once made, the reporter has the option of being kept anonymous.
  - There has been mention of making an anonymous report process available in our DIRE running ideas list.
- Who do in-person and online reports go to? Who has access to see reports?
  - Complaints can go to the Director of Human Resources, Deputy Director or supervisor, but unsure about access to records.
- Are police included in the process? When and how? Are individuals accompanied by an advocate or someone from the organization?
  - Police are not explicitly involved (there is nothing noted as to when they would be involved), but it is assumed that they would be involved if there was a violation of the law.
  - There is not a stated process for individuals to be accompanied by an advocate or someone from the organization.
- **What are the outcomes or consequences for reported individuals?**
  - Follow-up by supervisor, training (bias, etc.), disciplinary action, termination.
    - Section 3, Appendix B (similar wording in Appendix A, Section 3):
      - "Because we consider discrimination, harassment, abusive behavior, bullying, and cyberbullying to be serious matters, if it is determined that inappropriate conduct has been committed by one of our employees, we will act promptly to eliminate the offensive conduct and initiate disciplinary action where it is appropriate.



Such action may range from counseling to termination of employment.”

- Who decides the outcomes/consequences? What is the process?
  - This process is not listed in the Employee Handbook
  - The Director of Human Resources would be involved and Deputy Director, but the formal process is not written out for how consequences are decided.
- Are reports tracked?
  - It's unclear if there is a formal process for tracking reports.
    - Any disciplinary action is noted in a person's employee file, however.
  - How are they tracked? By who?
    - If they are tracked, then it would be by the Director of HR (Woodwell has 1 HR person).
- Are repeated complaints escalated to a disciplinary board? What is the process?
  - There is no stated or formal process shared.
  - Records of disciplinary actions are kept in an employee's file.
- **What resources are available for individuals reporting?**
  - Counselors or advocates, especially those of the same race, ethnicity, and gender.
    - None listed
  - Automatic or requested investigation of potential impact on grades or evaluations.
    - No process listed
  - Protection against retaliation or repercussions, accommodations for continuing work/courses, option for pass/fail or outside assessment.
    - There is a formal statement in the Employee Handbook (Appendix B) protecting against retaliation.
      - Anti-Retaliation Policy
        - It is the policy of Woodwell Climate that no negative employment action will be taken against individuals in retaliation for filing a discrimination charge, testifying, or participating in any way in an investigation, proceeding, or lawsuit under state or federal laws; or opposing employment practices that the employee reasonably believes discriminate against individuals, in violation of state and federal laws. No hardship, loss, benefit or penalty may be imposed on an employee in response to:
          - 1. Filing or responding to a bona fide complaint of discrimination, harassment, abuse or bullying.



- 2. Appearing as a witness in the investigation of a complaint.
      - 3. Serving as an investigator of a complaint.
    - Retaliation or attempted retaliation in response to lodging a complaint or invoking the complaint process is a violation of this policy. Any person who is found to have violated this aspect of the policy will be subject to sanctions up to and including termination of employment
  - There are no formal accommodations / process for accommodating work listed.
- 
- **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?
      - No formal process to propose changes, but the Director of HR is typically open to hearing suggestions for improvement.
    - Working groups or committees with power to change or propose changes to policy.
      - Committees associated with periodic strategic plans have varying degrees of power, and all usually have the power to propose recommendations.
    - Cultural surveys, regular or only after wide-spread reports or high-profile incidents.
      - DIRE committee recommended a cultural survey be done and it has been carried out along with formal staff training.
      - Unclear if offering cultural surveys would be a regular opportunity
    - Leadership proactively asks students and/or staff for input on how to improve.
      - Staff evaluations happen on at least a 6-month basis. This can be an opportunity to offer direct feedback to a supervisor, but it's unclear if that happens.
      - Leadership is technically open to hearing feedback, but they do not proactively ask in a way that all individuals would be comfortable sharing ideas.