



URGE Complaints and Reporting Policy for *WHOI Interdisciplinary Pod*.

This is what was found by *WH Interdisciplinary Pod* at *WHOI* 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.

Responses to deliverable prompts that were apparent from publicly facing information is shown in *orange italics*.

Responses that required follow-up with HR are in *purple italics*.

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

- Link - Organization, Company, University Policies
 - *WHOI policy: <https://www.who.edu/HR/harassment>*
 - *APO policy: <https://www.who.edu/what-we-do/educate/apo/reporting-concerns/>*
 - *Code of Conduct policy: <https://www.who.edu/wp-content/uploads/2020/09/Code-of-Conduct-Policy.pdf>*
 - *There are also cards that are handed out to chief scientists on ships that give details about reporting during fieldwork / shiptime (Kathi Benjamin distributes these)*
- Link - Department, Lab, Division, Advisor or Supervisor Policies
 - *Not readily available, but some individual labs at WHOI already do a nice job with posting policies, and others might model theirs after this: <https://alexanderlabwho.github.io/conduct/>*
 - *Kathi Benjamin recommends that if we make a lab policy that we have her and HR review it before posting it to any websites*
- Are reporting policies regularly reviewed?
 - *No, the WHOI website is outdated (created in 2003, updated last in 2011). Kathi at HR is aware of this and is actively addressing and fixing any typos.*
- What is the process for changing policy?
 - *We are set to talk to the senior administrators (i.e., various dept chairs) on March 23, we also had a productive call with the head of WHOI HR (Kathi Benjamin) on February 16th*
 - *Policy process and review is summarized here: <https://www.who.edu/website/institution-policy/policy-process-review>*
- Are the rates of reporting made publicly available (e.g. # of reports each year)?

- *Not to our knowledge. Kathi (in HR) noted that these things have been requested in the past, and she has pulled data. The nature of HR requests are highly variable: very few harassment reports, many more requests for help in dealing with a challenging workplace situation. COVID has impacted reporting as well, as HR (i.e., Kathi) also runs the WHOI COVID response. With hiring a diversity officer, there is hope that reporting and accessibility to data improves. Kathi explicitly told us that she and HR would like to do a better job with reporting but she felt she didn't have the resources due to COVID and this is something we can bring to the attention of the more senior administration at WHOI.*

What mechanisms are available for reporting complaints, bias, microaggressions, harassment, and overt racism?

- Who are the designated individuals/positions for reporting incidents?
 - *Incidents should be reported to the supervisor or academic advisor, department head or administrator, ship's Captain or Chief Scientist, or other appropriate resource personnel. If the person isn't comfortable speaking with these individuals, there is always an open line to Kathi Benjamin at HR.*
 - *For those seeking more informal advice or feedback, student or employee resource groups (e.g. WHOI Postdoctoral Association; Gays, Lesbians, & Others at Woods Hole) may be important resources, but it's not clear which groups have designated points of contact for this purpose.*
- Can reports be made online? Where? Yes/No, Link Anonymously? Yes/No
 - *Sort of, you can email or phone OpenLine by phoning 508-566-OPEN (6736) (FYI: we called at 2:18pm on 2-12-21 and no one answered and there was no option to leave a message) or emailing openline@comcast.net*
 - *This is outdated, Kathi was not aware of this (Kathi's never heard of openline) and will update as an action item.*
 - *Alternatively, we found this: WHOI Resources Available; **Employee and Student Assistance Program (ESAP)**: 800-648-9557 KGA offers free, confidential consultations, counseling and targeted referrals at no cost to you. Contact the ESAP 24/7 at: 800-648-9557 or visit www.kgreer.com and enter company code: WHOI*
 - ***WHOI EthicsPoint** confidential hotline: 866-868-0920; www.ethicspoint.com*
- Who do in-person and online reports go to? Who has access to see reports? Names and/or positions or "Not publicly listed/Unknown"
 - *They go to the EEO officer and/or title IX officer. But we don't really know who these people are - ultimately these things end up in HR, which Kathi Benjamin.*
 - *We have this website resource: <https://www.who.edu/what-we-do/educate/apo/reporting-concerns/>*
- Are police included in the process? When and how? Are individuals accompanied by an advocate or someone from the organization?
 - *Police would get involved if need be. Kathi at HR confirmed that this is the case and that they have been brought in on a case by case basis in the past. For example, any rape case or violence would immediately be brought to the police.*

- *Their telephone numbers are listed: **Emergency Contact***
- *WHOI Security: 505-289-2911*
- *Falmouth Police: 774-255-4527*
- *Not sure the specifics. But regarding being accompanied by an advocate or someone from the organization, yes it is fine. If someone wanted to file a complaint in person to a supervisor it would be totally accepted for them to be accompanied by someone they trust for support and to document the complaint. Likewise, if someone went directly to the police it would be totally fine for them to bring an advocate with them. **If you need a lawyer, reach out to HR or Chris Land directly.** However, we note that we could not easily find any specific policy details.*

What are the outcomes or consequences for reported individuals?

- **Follow-up by supervisor, training (bias, etc.), disciplinary action, termination.**
 - *Offenders found in violation of policy are subject to the following (quoted from the harassment policy link):*
 - *As with any other Institution EEO policy, individuals found in violation of this policy are subject to disciplinary action, which can include counseling, warnings, transfers, suspensions, reductions in pay or duties, and termination of employment. [This would be addressed on a case by case basis.]*
 - *Appropriate disciplinary action also will be taken against anyone who engages in any retaliation against a person reporting sexual harassment or other discriminatory harassment or against any other person who cooperates with an investigation into alleged violations of this policy.*
- **Who decides the outcomes/consequences? What is the process?**
 - *This is unclear, and not stated in the official policy.*
 - *HR (Kathi) creates a report with suggested consequences, all sent to Chris Land (WHOI legal counsel). Kathi and Chris will involve more people as they deem appropriate, including Dept Chair, Supervisor, Legal Dept, President and DDVP.*
- **Are reports tracked? Yes/No How are they tracked? By who?**
 - *Yes, HR tracks this, but due to COVID HR have not been able to keep up with the data. They want to do this (compile and turn over the data) but currently don't have the resources.*
 - *The official policy states: Allegations of or suspicions of misconduct should be reported. The Institution wants to ensure reporting mechanisms are easy and accessible. There are options which include, reporting to your supervisor, Director, Human Resources and EEO Officer, any member of Staff Council or Senior Administration, Dean, Associate Dean, Title IX Coordinator. In situations where an individual prefers to place an anonymous report in confidence, they are encouraged to use the WHOI Ethics Hotline, hosted by a third party provider, EthicsPoint. WHOI Ethics Hotline: 1-866-868-0920; website: www.who.ethicspoint.com. The information provided through the WHOI Ethics*

Hotline will be shared with the Institution's EEO Officer/Title IX Coordinator by EthicsPoint on a completely confidential and anonymous basis. Unless the individual allows differently, personal contact information will not be shared.

- Are repeated complaints escalated to a disciplinary board? What is the process?
 - *This is unclear, and not stated in the official policy. For example, Kathi refers back to the last few performance evaluations to see if this is repeat behavior etc.*

What resources are available for individuals reporting?

- Counselors or advocates, especially those of the same race, ethnicity, and gender.
 - *This is unclear, and not stated in the official policy. There is a resource called KGA, which can provide counseling. Kathi noted that COVID has affected the WHOI rollout of KGA and it has yet to be widely publicized or advertised, but it is in fact there as a resource.*
- Automatic or requested investigation of potential impact on grades or evaluations.
 - *This is unclear, we don't really understand the question.*
- Protection against retaliation or repercussions, accommodations for continuing work/courses, option for pass/fail or outside assessment.
 - *The official policy mentions that retaliation is unlawful, and in violation of the policy. Official language:*
 - *It is also unlawful and a violation of this policy to retaliate against an individual for making a report of sexual harassment or other discriminatory harassment or for cooperating with an investigation of a complaint of sexual harassment or other discriminatory harassment.*
 - *If a student is involved in an incident then title IX and the deans would get involved*

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?
 - *Kathi at HR says please just call and start the dialogue - might be easier than a more formal process. Letters to the president and HR are also a good avenue.*
 - *Policy can be proposed through the procedure described at the following link: <https://www.who.edu/website/institution-policy/policy-process-review>*
 - *However, it is unclear how these policy changes can be triggered by signatures, town halls, or other organization. Again, WHOI is relatively small and there isn't a quota for what requests trigger what actions, but Kathi and HR are open to hearing from any concerned parties.*
- Working groups or committees with power to change or propose changes to policy.
 - *A number of working groups and committees exists, including:*
 - *CDI working groups*
 - *Staff Counsel*
 - *Policy Advisory Group (PAG)*
 - *TSC and SciSec*
 - *Workplace Climate Committee (WCC)*

- *DAC (for woods hole <https://www.woodsholediversity.org/>)*
 - *Board of Trustees*
 - *URGE (in fact this is what we are doing now)*
- Cultural surveys, regular or only after wide-spread reports or high-profile incidents.
 - *Workplace climate survey in 2016*
 - *WCC is working to create regular reporting, but does not currently exist*
 - *DAC (broader WH scientific community)*
 - *Survey across WH institutions from 2018, AKA Livingston report:
<https://www.scribd.com/document/439213587/Woods-Hole-Diversity-and-Inclusion-Report-and-Recommendations>*
- Leadership proactively asks students and/or staff for input on how to improve.
 - *Open forums like Townhalls, visioning feedback, Pres. and VP attending department meetings, visioning groups etc.*