INTER-AMERICAN FOUNDATION POLICY ON HARASSMENT

It is the policy of the Inter-American Foundation (IAF or Agency) to provide employees a harassment-free work environment. As described below, the IAF prohibits harassment and has established procedures to prevent and promptly correct any harassment that may occur.

The IAF prohibits both (1) employment related harassment based on race, ethnicity, national origin, sex (including pregnancy status, sexual orientation, gender identity), religion, color, age, disability (mental or physical), genetic information (including family medical history), marital status, parental status, political affiliation, or veteran’s status; and (2) other harassing conduct that is detrimental to a safe and effective workplace, regardless if such conduct violates Equal Employment Opportunity (EEO) law. All employees, including managers and supervisors, shall receive periodic training on this policy.

(1) Unlawful Harassment

Under EEO law, harassment is any verbal or physical conduct, based on race, color, religion, national origin, age, disability, sex (with or without sexual conduct), genetic information, or protected activities, that either results in a tangible employment action or is so severe and pervasive as to constitute an intimidating, hostile or offensive work environment, including, but not limited to: (1) verbal conduct that could include racial or sexual epithets, foul language, unwanted sexual flirtations, ethnic jokes, derogatory statements or slurs; (2) physical conduct that could include improper touching or assault; or (3) visual harassment that could include racially or sexually explicit or derogatory posters, cartoons or drawings, or obscene gestures.

One form of unlawful harassment is sexual harassment. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when “(1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment, 2) submission to or rejection of such conduct by
an individual is used as the basis for employment decisions affecting such individual, or 3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive working environment.” 29 C.F.R. § 1604.11.

The following is a non-exhaustive list of examples of behaviors that may constitute harassment, including sexual harassment:

- Making offensive or unwelcome remarks about looks, clothing, or body parts
- Pressure for dates
- Touching in a way that may make an employee feel uncomfortable
- Telling sexual jokes, hanging sexual posters, etc.
- Epithets, slurs, negative stereotyping or threatening, intimidating, or hostile acts that relate to race, color, religion, gender, national origin, age, disability, sexual orientation, genetic information, or status as a parent
- Written or graphic material that denigrates or shows hostility or aversion toward an individual or group because of race, color, religion, gender, national origin, age, disability, sexual orientation, genetic information, or status as a parent, and that is placed on walls, bulletin boards, or visible elsewhere on the IAF premises, equipment, or electronic circulation of such material

(2) Other Harassing Conduct

In addition to the prohibition of harassment that violates EEO law, IAF policy also prohibits other harassing conduct that is detrimental to a safe and effective workplace. Such conduct may include but is not limited to:

- Bullying
- Blame without justification
- Exclusion or social isolation
- Excessive micro-managing
- Tampering with an employee’s personal belongings

Employees are encouraged to report any such conduct immediately to their supervisor, an appropriate management official, the EEO director or directly to the Chief Operating Officer, who will make every effort to prevent or eliminate conduct before it rises to the level of unlawful harassment.

The IAF will quickly gather the facts involved in a situation and take whatever remedial action or disciplinary action may be warranted under the circumstances. This process is administered by the Chief Operating Officer, who, whenever a concern about harassment comes to their attention, will, within ten days, commence the following thorough and impartial process: (1) assess whether it is appropriate to trigger the expedited process, (2) determine whether the fact finding phase of that process is most appropriately conducted by internal Agency personnel or an
outside investigator, and (3) forward the results of the fact finding, along with their recommendation for any follow up actions, to the President and CEO for final decision on the matter. Employees or applicants may submit concerns about harassment directly to the Chief Operating Officer.

**EEO Complaint Process**

In addition to the process summarized above, individuals who believe they have been subjected to EEO based harassment, retaliation, or any other form of discrimination on the basis of a protected class (race, color, religion, sex (including gender identity, sexual orientation, and pregnancy), national origin, age (40 or older), disability or genetic information) may file an EEO complaint by contacting the EEO Director. Please be advised that, to be accepted as timely, a complaint of harassment must be submitted to the EEO Director within 45 calendar days of the alleged harassing incident. For further information on the EEO process, please contact the EEO Director at eeo@iaf.gov or (202) 360-4530.

Other possible resources available to the employees for reporting allegations of harassment include the IAF Office of Operations, the IAF Administrative Grievance procedure, the U.S. Office of Special Counsel if a prohibited personnel practice is involved, the Merit Systems Protection Board if an appealable adverse action is involved, and the USAID Office of Inspector General.

All actions taken to resolve and address issues of harassment will be kept confidential to the greatest extent possible, and retaliatory action against an employee or applicant who raises a claim of harassment, or who has witnessed harassment, will not be tolerated. The IAF will undertake immediate and appropriate corrective action, including discipline, whenever it determines that harassment has occurred in violation of the Agency’s policy. Any employee found to have participated in harassment of any kind, or retaliation, will be the subject of appropriate administrative or disciplinary action, which may include removal from federal service.