

Title:	Investigating Sexual Harassment	Effective Date:	03/07/2019
Author:	Camille Tanner	Last Review Date:	06/22/2021
Location:	All Locations	Last Revision Date:	10/29/2020
Functional Area:	Human Resources		

POLICY

All complaints or information about sexual harassment will be investigated, whether that information was reported in verbal or written form. The purpose of this policy is to provide guidance for conducting investigations in a fair, impartial, and timely manner. All investigations will be confidential to the extent possible.

PROCEDURE

An investigation of any complaint, information, or knowledge of suspected sexual harassment will be prompt and thorough, commenced immediately, and completed as soon as possible. The investigation will be kept confidential to the extent possible. All persons involved, including complainants, witnesses, and alleged harassers will be accorded due process, as outlined below, to protect their right to a fair and impartial investigation.

Any individual may be required to cooperate, as needed, in an investigation of suspected sexual harassment. Liberty will not tolerate retaliation against anyone who files complaints, supports another's complaint, or participates in an investigation regarding a suspected violation.

While the process may vary from case to case, investigations should be done in accordance with the following steps:

- Upon receipt of complaint, a person or persons designated by the VP of Human Resources will conduct an immediate review of the allegations, and take any interim action (e.g., instructing the respondent to refrain from communications with the complainant, placing employees on administrative leave until an investigation is concluded), as appropriate. If complaint is verbal, encourage the individual to complete the "Complaint Form" in writing. If he or she refuses, prepare a Complaint Form based on the verbal reporting.
- If documents, emails, or phone records are relevant to the investigation, take steps to obtain and preserve them.
- Request and review all relevant documents, including all electronic communications.
- Interview all parties involved, including any relevant witnesses.
- Submit written documentation of the investigation (such as a letter, memo, or email) to the VP of Human Resources, which contains the following:
 - ✓ A list of all documents reviewed, including a detailed summary of relevant documents;
 - ✓ A list of names of those interviewed, including a detailed summary of their statements, signed by the individual interviewed;
 - ✓ A timeline of events;
 - ✓ A summary of prior relevant incidents reported or unreported;
 - ✓ Recommendation for final resolution of the complaint, together with any corrective action(s).

Keep the written documentation and associated documents in a secure and confidential location.

Time is of the essence when investigating an allegation of sexual harassment. The investigator will make all reasonable efforts to initiate an investigation into the allegations and conclude the investigation in a timely fashion.

The VP of Human Resources, in consultation with General Counsel, will determine the final disposition of the complaint, including any corrective action and will communicate this disposition. The VP of Human Resources will notify the investigator of the decision with instructions to promptly notify the individual who reported, and the individual(s) about whom the complaint was made, of the final determination and implement any corrective actions identified in the written document.

Approved By: _____

Revision History

Version	Date	Author	Summary of Changes
#1	03/07/2019	Camille Tanner	Policy Created
#2	10/29/2020	Camille Tanner	Policy reviewed with no changes needed
#2	06/22/2021	Camille Tanner	Policy reviewed; no changes