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<b>17. 10. 2022</b>	<b>until repealed</b>	<b>AMBIS University</b>
<p>Document title:</p> <p style="text-align: center;"><b>Investigation of complaints concerning sexualized violence or sexual harassment</b></p> <p>Approved by: (document editor) <span style="float: right;">Date: 17. 10. 2022</span></p> <p style="text-align: center;">Dr. Martina Mannová member of the board <span style="float: right;">Radek Stavinoha member of the board</span></p>		
No. of appendices:	<b>0</b>	Title of appendices:
		Non-disclosure Agreement
No. of copies:		Consent for Processing Personal Data
No. of edition:	1.	Repealed:
<b>First</b>		

## Art. I

### Introductory provision

- 1) AMBIS University (hereinafter the “**AMBIS**”) is committed to being a safe organization for all its students, academic staff, and other employees and collaborators. For this reason, it expressly declares its disagreement with all forms of sexualized violence or sexual harassment that could occur within AMBIS and commits through this regulation to conduct a thorough investigation of any such reported incident and to provide all possible support to its victims.
- 2) For this purpose, AMBIS establishes the role of an ombudsman for sexualized violence and sexual harassment (hereinafter referred to as "ombudsman"), who will lead the investigation of reported cases as an external neutral partner to clarify the case as quickly and sensitively as possible, and also issues this internal directive setting out the rules for investigating reported complaints.
- 3) The term of office for the ombudsman is 3 years, with the position ending upon their resignation or dismissal. The ombudsman is appointed and dismissed by the rector of AMBIS. The same individual may serve as ombudsman more than once.
- 4) The first ombudsman is JUDr. Lucie Hrdá, Czech Bar Association No. 11778, attorney at law office AK Hrdá Ltd., located at Vinohradská 6, Prague 2, ID No.: 06717969.

## Art. II

### Methodology

#### 1) Notification

- The alleged harasser shall report the case via email to ombudsman@ambis.cz, providing a description of the incident and their contact details. This email message is directly forwarded to the ombudsman without any intervention from AMBIS, and optionally to the rector of AMBIS who is bound by confidentiality regarding its content.

#### 2) First Step: Preparation

- Initially, a total of 2 individuals will be involved in the investigation: the alleged harasser as an employee or collaborator of AMBIS (hereinafter referred to as the "**alleged harasser**"), the alleged victim as a student or employee or collaborator of AMBIS (hereinafter referred to as the "**alleged victim**"), with their consent, and the rector of AMBIS.
- Due to the confidential nature of the investigation, the involvement of other individuals will be minimized by the ombudsman, and if an expanded investigation takes place, AMBIS will be informed, which must provide consent for further questioning of additional individuals.
- The meeting between the ombudsman and the rector of AMBIS for the purpose of a general exchange of information regarding the submitted and investigated complaint, related events, documents, and other elements submitted by the parties, is confidential. The confidential information provided will then serve as a starting point for preparing the questioning process for both parties.

#### 3) Second Step: Investigation

- AMBIS will inform the affected individuals about the initiation of the investigation and that they will be contacted by the ombudsman to schedule an interview in this context.

To maintain neutrality and confidentiality, the interviews ("questioning") will always take place in the office - headquarters of the ombudsman.

- The investigation process will begin with the completion of the Confidentiality agreement and Consent to the Processing of Personal Data. Both documents constitute Annex No. 1 and 2 to this regulation on the part of the alleged harasser and the alleged victim.
- The investigation will further proceed through individual interviews with each of the affected individuals. At the beginning of the interview, after verifying the identity of the individual, the ombudsman will explain the processes and objectives of the interview and inform them of the strictly confidential nature of the interviews and the neutrality of the investigation process and the ombudsman. To build and maintain trust between the parties, and thus increase the chance of gathering relevant information about the events preceding the complaint, it is crucial that the ombudsman and AMBIS continually communicate their willingness to shed light on relevant events and the fact that there will be no form of retaliation.
- During the investigation process and related questioning, it may be necessary to verify the information or events mentioned by individual parties with other employees who may be identified as potential witnesses to these specific pieces of information or events. In this case, the ombudsman will contact AMBIS and request their consent and coordination to include these individuals in the investigation process. During interviews with potential witnesses, only relevant information or events related to the complaint and/or previous interviews will be discussed, and only these will be documented to limit the spread of information and ensure confidentiality.

#### **4) Third Step: Investigation Report**

- After conducting all interviews and gathering all relevant information, the ombudsman will prepare an investigation report. The report will include detailed information about the context, methodology, claims/events relevant to the complaint proceeding, a summary of evidence confirming or rejecting accusations/events, and a general conclusion including recommendations for further action. The investigation report will not contain full names, and employees and other participants mentioned in it will be identified using the initials of their names.

#### **5) Fourth Step: Delivery of the Investigation Report**

- The final report may be personally delivered by the ombudsman to AMBIS University or sent via data box.
- AMBIS has the right to request a personal meeting with the ombudsman to explain the content of the report.

### **Art. III**

## **Obligations of the Parties**

#### **1) Confidentiality**

- The ombudsman acknowledges that this measure establishes a confidential relationship and that information related to AMBIS business affairs, personal data of students, employees, collaborators, financial details, assets, operational methods, computer programs, documentation, and similar information, whether written, oral, or otherwise, are inherently confidential. All such information pertaining to AMBIS

University and the conducted investigation shall collectively be referred to as "confidential information." The ombudsman provider is obligated to adhere to AMBIS procedures for securing information and will take all further reasonable measures to protect confidential information.

2) 2) Confidentiality Commitment

- The ombudsman must not disclose any information regarding AMBIS activities, internal processes, and procedures. This includes both private and professional information concerning AMBIS University, its employees, and collaborators.

3) 3) Liability

- The ombudsman shall not be liable for lost profits, revenues, contracts, anticipated savings, or any other indirect or consequential losses incurred by AMBIS during the performance of its duties in investigating reported complaints or as a result of such performance, except in cases of breach of contract, willful misconduct, or gross negligence.

## **Art. IV Related Documents**

- 1) Rector's Directive No. VP-R-10 Measures Against Sexual Harassment.
- 2) Code of Ethics of AMBIS.

## **Art. V Appendices**

As appendices to this measure are:

- Appendix No. 1 Confidentiality Agreement
- Appendix No. 2 Consent to the Processing of Personal Data.

## **Art. VI Concluding provisions**

- 1) All employees have the right to access this measure, which is therefore available electronically in the directory of controlled documentation and printed form at the personnel department and with the administrator of controlled documentation.
- 2) All employees are required to familiarize themselves with this central internal directive.
- 3) Gender-neutral masculine terms are used to designate individuals in this measure.
- 4) This measure shall enter into force upon signature and become effective as of the date indicated on the cover page.

## **Art. VII Distribution list**

- 1) Copy 1 administrator copy.
- 2) Copy 2 loan copy.