

IZA Code of Conduct – Reporting Procedures

I. Reporting¹

Any misconduct regarding the IZA Code of Conduct or the Code of Conduct for IZA Events or any breach of law by IZA staff can be reported to a neutral body.

For IZA employees their supervisors, the HR department or the IZA Management Team as well as the IZA Ombudsperson are available for consultation and act as a first point of contact.

Persons interacting with IZA on a professional basis (“third parties”), such as visiting researchers, network members, study participants or external collaborators, are also free to contact the IZA Management Team or the IZA Ombudsperson in case of any misconduct.

Visitors of an IZA Event can submit a report to the IZA Event Team, the IZA Scientific Organizers or the IZA Ombudsperson.

Whereas the contact persons in the HR department, the Management Team and the IZA Event Team are employees of IZA, the two Ombudspersons are lawyers of an external law firm and are not part of the organization of IZA. They can always be contacted directly and for any reason – anonymously if preferred. The Ombudsperson also offers a safe channel if a member of the IZA Management Team is subject to the report.

II. Form of a report

Reports can be submitted in person, by letter, by email, or by telefax. Please use the respective contact data published in the IZA Code of Conduct or the Code of Conduct for IZA Events.

III. Reporting anonymously

The IZA internal teams offer to report an issue without revealing one’s identity using an online service like <https://anonymousemail.me> to send an anonymous email to any IZA point of contact. If using this channel, please include all necessary information for the respective team to be able to process the report as it is not possible to get back to the reporting person in this case.

The Ombudsperson also offers a safe channel as reports will be recorded anonymously and/or will be forwarded anonymously, if requested by the reporting person. In these cases, the reporting person will remain anonymous towards IZA; the identity of the reporting person will not be investigated by IZA or revealed by the Ombudsperson unless required by law.

IV. Immediate response

If an immediate response is required and desired by the reporting person, e.g., due to ongoing harassing behavior, the IZA Management Team, the supervisor or any member of the HR department retains the right to take actions necessary to stop the offender. In addition, colleagues are expected to support.

During events, the IZA Event Team and Scientific Organizer(s) take over this role to keep IZA a welcoming environment for everybody. They are also available to help contact hotel or venue security,

¹ These procedures are partly based on the ones applied by ESA.

local law enforcement or assist otherwise. Staff members and participants asked to stop any harassing behavior are required to comply immediately.

If the report is made to the Ombudsperson they will inform IZA to enable an immediate response.

Regular procedures after reporting

When taking a report to an IZA internal point of contact, they will adhere to the strictest confidence in handling it. They may involve others to the extent that is required to ensure the report is managed properly. Any report handed in to an internal point of contact will be passed on to the Ombudsperson who will act as the central coordinator for the subsequent process.

After receiving the report, the Ombudsperson opens a case file and documents the information and further communication in written or digital form. If the reporting person has provided contact details, the Ombudsperson will contact the reporting person within one week of receiving the report. The Ombudsperson confirms receipt of the report, clarifies the facts together with the reporting person, gathers the available evidence of the possible misconduct, checks for plausibility, and makes an initial legal assessment.

Without sufficiently strong suspicion, the Ombudsperson will terminate the proceedings and inform the reporting person accordingly.

If there is sufficient suspicion of a violation of legal regulations or of the IZA Code of Conduct and if the reporting person has consented, the Ombudsperson will consult with the IZA Management Team. The investigation itself will be conducted by an external lawyer to be mandated and paid by IZA. This lawyer will be provided the facts of the case confidentially by the Ombudsperson, who retains an advisory role in the further investigation. The scope, type, and duration of the investigation will depend on the individual case.

Every investigation will be handled respectfully. All persons involved will be provided safe communication channels. The reporting person will never be urged to confront anyone, and their anonymity will be ensured if desired. Anyone submitting a report in good faith is protected against any means of retaliation even if the reported facts turn out to be incorrect or not verifiable. Retaliation (e.g. detrimental measures under labor law, damage to reputation, bullying) is strictly forbidden and is a compliance breach in itself.

In case of an anonymous report, it is not possible to follow up with the reporting person directly. Still, the Ombudsperson will investigate an anonymous report to the fullest extent and IZA will take all feasible actions to prevent a recurrence.

Individuals who are subject of a report will be given notice and an opportunity to be heard prior to any action taken by IZA.

V. What happens if an IZA Management Team member is subject to the report?

Should the accusation of a potential violation be directed at a member of the IZA Management Team or if there is the possibility of a conflict of interest for other reasons, the Ombudsperson will consult the President of the Deutsche Post Stiftung. If the allegation is directed against the President, the Chairman of the Board of Trustees of the Deutsche Post Stiftung is to be consulted by the Ombudsperson. They will ensure that the investigation conducted by the external lawyer is free of conflicts of interest and they will decide on possible sanctions.

VI. Measures taken by IZA authorities in case of violation

The investigation ends with the final assessment of the external lawyer. On this basis, the IZA Management Team reserves the right to take actions against individuals who have violated legal regulations or the IZA Code of Conduct.

- If a report against a staff member is determined to be founded, and it is established – by a preponderance of the evidence – that the incriminated person behaved in an unethical manner, the IZA Management Team has the option to sanction the employee in accordance with labor law.
- For network members and event participants consequences include warnings, exclusion from current and future events, exclusion from the IZA network and potential official function or reporting the incident to the respective employer.
- Processes relevant to criminal law are handed over to the responsible authorities.

Reporting persons are entitled to receive feedback in due course after the closing of the investigation, preferably within three months from submitting the report. However, details may be limited due to data protection regulations. Also, the person subject to the report will be provided appropriate feedback safeguarding the personal rights of the reporting person and holding up confidentiality.

VII. How is my data protected?

The data of the reporting person, the data of the persons who are the subject of the report and the data of other persons named in the report may only be disclosed if and insofar as this is necessary for the investigation or for the implementation of follow-up measures and if the reporting person has explicitly consented or if there is a legal obligation to forward the report (c.f. par. 138 of the German Criminal Code).

If participants of IZA events are subject to a report, the further procedure may be passed on to the respective employer. The procedure can also be handed over to a competent investigating authority.

If and insofar as the reporting person requests it, the report will be recorded anonymously and/or will be forwarded anonymously to the investigating lawyer. In these cases, the reporting person will remain anonymous towards IZA; the identity of the reporting person will not be investigated by IZA or revealed by the Ombudsperson unless required by law.

IZA has waived all claims against the Ombudsperson for the release of documents arising from the Ombudsperson's work. This waiver also applies to documents that the Ombudsperson receives from the reporting person or that the Ombudsperson prepares in connection with the processing of the report.