



United States
Office of Government Ethics
1201 New York Avenue, NW., Suite 500
Washington, DC 20005-3917

March 1, 2012

MEMORANDUM

TO: All OGE Employees

FROM: Don W. Fox, Principal Deputy Director

A handwritten signature in dark ink, appearing to read "Don Fox", written over the printed name.

SUBJECT: OGE Policy Statement on Anti-Harassment

The Office of Government Ethics (OGE) is committed to providing a work environment that is free from harassment and to taking steps to prevent harassment in the workplace as early as possible. Therefore, it is OGE's policy to take immediate and appropriate action when the Agency is made aware of allegations of harassment or determines that harassment has occurred.

Harassment is defined as any unwelcome verbal or physical conduct, based on an employee's race, color, gender, national origin, age, disability, status as a parent, genetic information or gender identity, which can reasonably be considered to adversely affect the employee's work environment, or an employment decision affecting an employee based upon the employee's acceptance or rejection of such conduct. While isolated incidents generally do not constitute harassment, a pattern of incidents may meet the threshold of creating a hostile work environment. In addition, a single incident that is severe and pervasive may constitute harassment. As used under this Policy, the term harassment includes sexual harassment.

It is the responsibility of all OGE employees to promptly report possible incidents of harassment to their supervisors or other appropriate management official. Upon receipt of a report or complaint of alleged harassment, management will ensure that the allegations are investigated. If it is determined that the allegations of harassment are substantiated, appropriate corrective and/or disciplinary actions will be taken, up to and including removal of the offender. OGE's goal with regard to findings of harassment is to both take corrective action and to ensure that no further harassing conduct occurs.

OGE management officials have a duty to foster and maintain a non-hostile work environment, and can be held accountable for not only their own behavior, but also that of their employees. If an employee engages in harassing conduct towards another employee, and the matter comes to management's attention, management must take prompt action. Further, if an employee complains to management about alleged harassment, management is obligated to investigate the allegation regardless of whether the complaint conforms to a particular format, or is made in writing. Management officials have a duty to carry out their responsibilities under this Policy. Failure to do so may result in disciplinary action.

OGE employees are responsible for coming forward and reporting to an appropriate management official any behavior they view as harassment *before* it becomes severe or pervasive. Employees are also responsible for taking advantage of any preventative or corrective opportunities provided by OGE or to otherwise avoid harm.

Employees who make a good faith report of harassing conduct or who assist in any inquiry regarding such a report are protected from retaliation, which is not tolerated at OGE. In addition, all reports of harassment will be kept confidential to the fullest extent possible without impeding an investigation into the allegations.

This Policy is separate and distinct from any administrative grievance process or statutory complaint process that also covers allegations of harassment, such as the EEO complaint process. To initiate an EEO complaint, an employee must contact an EEO counselor within 45 days of the alleged incident of harassment, notwithstanding any actions taken by management officials pursuant to this Policy.