

INTERNAL ANTI-DISCRIMINATION POLICY

AT THE MOSSAKOWSKI MEDICAL RESEARCH INSTITUTE, POLISH ACADEMY OF SCIENCES

§ 1

General Provisions

1. This document reflects the internal anti-discrimination policy at the Mossakowski Medical Research Institute, Polish Academy of Sciences (MMRI PAS). The implementation of the Policy aims to:
 1. prevent the occurrence of discrimination in the workplace by demonstrating that no manifestation of discrimination, harassment, or sexual harassment will be tolerated by the employer;
 2. ensure that intervention measures are taken in the event of the occurrence or suspected occurrence of the phenomena referred to in the Internal Anti-Discrimination Policy.
2. Every employee and doctoral student is obliged to familiarize themselves with the Internal Anti-Discrimination Policy, confirm this fact with a statement, and apply the Policy while performing their professional duties.

§ 2

Definitions

1. **Doctoral Student** – means a person performing work related to a doctoral dissertation, receiving education at a doctoral school, and preparing a doctoral dissertation at MMRI PAS.
2. **Discrimination** – means direct or indirect unequal, inferior, or unfair treatment of an employee or a group of employees due to their actual or perceived identity characteristics, in particular: sex, gender identity, skin color (race), national and/or ethnic origin, religion, denomination or lack thereof, worldview, health status and degree of disability, age, sexual orientation, political opinions, trade union membership, social and economic status, full-time or part-time employment, fixed-term or indefinite-term employment.
3. **Anti-Discrimination Commission** – means a collegial body appointed by the Director of MMRI PAS to conduct explanatory proceedings, acting on the basis of and within the limits specified in the Policy and the regulations of the Director of MMRI PAS.
4. **Harassment and Sexual Harassment** – means a form of discrimination manifested by unwanted conduct, including unwanted conduct of a sexual nature or relating to gender, the purpose or effect of which is to violate the dignity of an employee, in particular by creating an intimidating, hostile, degrading, humiliating, or offensive atmosphere. This behavior may consist of physical, verbal, or non-verbal elements.
5. **Employer or MMRI PAS** – means the Mossakowski Medical Research Institute, Polish Academy of Sciences, represented by the Director of MMRI PAS.
6. **Employee** – means a person in an employment relationship with MMRI PAS, as well as a person performing work for MMRI PAS on the basis of a civil law contract.

7. **Complaint** – means a written notification by an employee or doctoral student indicating the use of actions or behaviors against them or other employees or doctoral students that bear the hallmarks of discrimination, unequal treatment, harassment, and/or sexual harassment.
8. **Party/Parties to the proceedings** – means the person who filed the complaint and the person(s) suspected of having committed discriminatory acts or omissions to which the discrimination complaint relates.
9. **Internal Anti-Discrimination Policy or Policy** – Internal Anti-Discrimination Policy at the Mossakowski Medical Research Institute, Polish Academy of Sciences in Warsaw – means this document, which specifies preventive measures, the procedure for dealing with the occurrence or suspected occurrence of discrimination, unequal treatment, harassment, and sexual harassment, as well as the rights and obligations of employees or doctoral students affected by such actions.

§ 3

Prohibition of Discrimination

1. Any discrimination and encouragement thereof, in particular in the workplace, among employees, persons employed under civil law contracts, and doctoral students, is prohibited.
2. Relations between all members of the MMRI PAS community, including supervisors and subordinates, are based on respect, tolerance, and regard for personal dignity and worldviews.
3. Counteracting discrimination is implemented in particular through:
 1. compliance with the principles resulting from labor law provisions and this Policy;
 2. promoting desirable ethical attitudes and behaviors consistent with the principles of social coexistence;
 3. resolving conflicts with colleagues with respect for the personal dignity of the parties to the conflict and the organizational culture of MMRI PAS;
 4. immediate response to noticed or reported manifestations of discrimination, including reporting them in accordance with the procedure described in § 4 below;
 5. preventive measures as part of day-to-day management, related in particular to the use of objective criteria for assessing work results and educational progress, clear definition of the scope of duties and responsibilities of employees and doctoral students, as well as proper communication;
 6. applying consequences provided for by law, in particular labor law, to persons confirmed to have committed discrimination;
 7. conducting monitoring activities in the field of discrimination and training in the field of anti-discrimination and equal treatment.
4. The Employer is obliged to take all legally permitted measures to prevent discrimination, including harassment and sexual harassment, in the workplace or in connection with work performed outside the employer's premises, and to remove the effects of discrimination.

§ 4

Rules for Filing a Complaint and Appointing the Anti-Discrimination Commission

1. Every employee and doctoral student who believes that they or another employee or doctoral student have been subject to actions or behaviors of a discriminatory nature,

- unequal treatment, harassment, or sexual harassment, has the right to file a complaint with the Director of MMRI PAS.
2. The Director of MMRI PAS shall appoint an Anti-Discrimination Commission within 14 days to conduct explanatory proceedings.
 3. The Anti-Discrimination Commission consists of:
 1. a person representing the Director of MMRI PAS – as the chairperson;
 2. two employee representatives, indicated by the workplace trade union organization;
 3. an employee of the Personnel Affairs Department (HR) or a person performing the tasks of the Director's Plenipotentiary for HR.
 4. In the event that the accused or the complainant is the Director of MMRI PAS, the complaint is submitted to the Chairperson of the Scientific Council, who performs the actions provided for in this Policy for the Director of MMRI PAS.
 5. If the person whom the complaint concerns is the Director of MMRI PAS and the complaint is considered justified, the Chairperson of the Scientific Council notifies the President of the PAS of the situation.
 6. The complaint should be submitted in writing to the Director of MMRI PAS via the Secretariat, in a sealed envelope, with a note that the complaint should be delivered directly to the hands of the Director of MMRI PAS.
 7. The complaint should contain in particular:
 1. specific actions, omissions, or behaviors constituting a manifestation of discrimination, unequal treatment, harassment, or sexual harassment, together with their detailed description, including the period in which the reported actions or behaviors took place;
 2. data of the employee or doctoral student whom the complaint concerns;
 3. data of potential witnesses of the reported actions or behaviors;
 4. any other evidence confirming the occurrence of the reported actions or behaviors;
 5. the date of filing the complaint and the handwritten signature of the complainant.
 8. Complaints submitted anonymously shall not be considered.

§ 5

Proceedings of the Anti-Discrimination Commission

1. Proceedings of the Anti-Discrimination Commission are conducted in a manner that ensures impartiality and objectivity and are confidential, and the meetings of the Anti-Discrimination Commission are closed to the public.
2. Members of the Anti-Discrimination Commission are obliged to maintain the confidentiality of all information they learn during the explanatory proceedings. Before starting work, members of the Commission submit an appropriate statement in this regard. Documentation of the proceedings conducted by the Anti-Discrimination Commission is not available to the parties and witnesses.
3. The complaint is considered within 60 days from the date of its receipt, unless an extension of this period is necessary for the proper conduct of the proceedings.
4. The Anti-Discrimination Commission may oblige the parties and witnesses (employees or doctoral students) to provide oral or written explanations. Meetings of the Anti-Discrimination Commission may be held using means of remote electronic communication (e.g., video conferencing) or in a hybrid mode.
5. When considering a complaint, the Anti-Discrimination Commission may state its validity, groundlessness, or failure to resolve the complaint due to the lack of possibility of an unambiguous and unquestionable resolution. Decisions of the Anti-

Discrimination Commission are made by a simple majority of votes, and in the case of an equal number of votes, the chairperson's vote is decisive.

6. The proceedings of the Anti-Discrimination Commission end with the submission of a report to the Director of MMRI PAS, and in the cases referred to in § 4 sec. 4, to the Chairperson of the Scientific Council. The report contains, in particular, the conclusions of the Anti-Discrimination Commission from the conducted proceedings and any recommendations for the Director of MMRI PAS. The chairperson signs the report on behalf of the Anti-Discrimination Commission. The report may be made available to a party to the proceedings upon request.
7. The parties to the proceedings (the person filing the complaint and the accused party) have the right to appeal against the findings and conclusions contained in the report of the Anti-Discrimination Commission.
8. The appeal is submitted in writing to the Director of MMRI PAS (or to the Chairperson of the Scientific Council if the Director was a party to the proceedings) within 14 days from the date of receipt of the report.
9. The appeal should contain allegations against the report and their substantive justification.
10. The Director of MMRI PAS (or the Chairperson of the Scientific Council) considers the appeal within 30 days from the date of its receipt, taking into account the material collected during the explanatory proceedings. The decision of the Director of MMRI PAS/Chairperson of the Scientific Council after considering the appeal is final within the framework of this Policy.

§ 6

Follow-up Actions and Liability of the Parties

1. In the event that the complaint is considered justified:
 1. the employer immediately takes measures aimed at eliminating the identified irregularities and preventing their recurrence;
 2. a penalty provided for in the Labor Code, the regulations of doctoral studies, or another penalty provided for in generally applicable regulations, including an order penalty (admonition, reprimand), a disciplinary penalty, or termination of the employment contract, may be applied to the perpetrator or perpetrators.
2. Whenever possible, the affected employee (or doctoral student) may be transferred to another job position at their request or with their written consent.
3. In the event of filing a grossly groundless complaint, including in particular one containing false information, filed solely for the purpose of malicious accusation of another employee or doctoral student, the person filing the complaint is subject to sanctions provided for the violation of employee/doctoral duties referred to in sec. 1 item 2 (above).

§ 7

Premises Excluding the Proceedings

The proceedings shall not be conducted if:

1. The person filing the complaint does not supplement the complaint within the specified period.
2. The employment relationship has terminated or any of the parties to the proceedings (employee or doctoral student) has been removed from the list of doctoral students, or actions aimed at terminating the employment relationship or removal from the list of doctoral students have been taken.

3. The case concerns the same act or is based on the same factual basis as a case that has been or is pending before a court.

§ 8

Prohibition of Retaliation

1. Any retaliatory actions (retaliation) are strictly prohibited, including: harassment, deterioration of working conditions, discrimination in evaluation or promotion, or other negative treatment directed against an employee, doctoral student, or other person who:
 1. filed a complaint in good faith;
 2. acted as a witness in explanatory proceedings;
 3. provided assistance during proceedings conducted on the basis of this Policy.
2. Violation of the prohibition of retaliation constitutes a serious breach of basic employee duties and is subject to the sanctions referred to in § 6 sec. 1 item 2).

§ 9

Final Provisions

1. The processing of personal data, including sensitive data (special categories of data) of the parties and witnesses of the proceedings, takes place with absolute respect for the provisions of the GDPR Regulation and national personal data protection regulations.
2. MMRI PAS employees employed on the date of entry into force of this Policy shall submit statements of familiarization with its content to the Personnel Affairs Department, while doctoral students to the Office for Doctoral Students, within 30 days from the entry into force of the Policy.
3. Employees and doctoral students who start employment or education at MMRI PAS after the entry into force of the Policy shall familiarize themselves with the Policy upon entering into an employment relationship or starting education, and the statements submitted by them are stored by the departments mentioned in sec. 2.
4. This Policy enters into force on the date specified by the Director of MMRI PAS in the regulation implementing it.

DIRECTOR Prof. Leonora Bużańska, MD, PhD