

# Concern Resolution Procedures

Version 1.1

April 2024

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## 1. Version Control

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### Document Formulation:

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### Document Amendments:

Date	Version	Changes made by	Changes approved by	Description of change
April 2024	1.1	Director – Human Resources	Director General	Designations added as per the current organization structure.  Disciplinary Procedures added for workforce members.

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The Institute reserves the right to amend, suspend or rescind this policy at any time. While, the Institute has made best efforts to define detailed procedures for implementation of this policy, there may be occasions when certain matters are not addressed or there may be lack of clarity in the procedures. Such difficulties or lack of clarity will be resolved in line with the broad intent of the policy, by the Director General or Governing Board Chair (on case-to-case basis). The Institute may also establish further rules and procedures, from time to time, to give effect to the intent of this policy and further the objective of good corporate governance.

## 2. General

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### 2.1 Authority and Implementation

- a. The procedures outlined in this document reflect the conditions of service, basic rights, duties, and obligations of staff members of ICRISAT, as approved by the Director-General.
- b. Any change to this document will require the formal written approval of the Director-General. Any exceptions concerning the Director General (DG) shall be approved by the Governing Board (GB).

### 2.2 Review and Amendment

The policies and procedures herein are subject to review and amendments on the totality of several factors, including the Memoranda of Understanding / Agreement(s) with host country governments; applicable laws and regulations; customs and practices in different locations; the concerns and actions of its various stakeholders.

### 2.3 Exceptions

Any exception to the procedures outlined in this document shall require an approval from Director General (DG) of the Institute. Any exceptions concerning the Director General (DG) shall be approved by the Governing Board (GB). The Document Owner shall be informed of these exceptions and he/ she shall maintain a record of these for monitoring purpose.

### 2.4 Frequency of review

This Policy shall be reviewed by the Policy Owner at least once in every 36(thirty-six) months period from the implementation date or from the date of last review or as directed by the Policy Council.

### 2.5 Interpretation

This document shall be read in the context of:

- i. Human Resources Management Policy
- ii. Other Human Resources policies
- iii. The relevant Host-Country Agreement
- iv. Immunities and privileges, laws, and protocols of the country where the staff member is based, if applicable, to ICRISAT and/or to its staff members
- v. Individual contracts of employment

### 2.6 Clarifications

Questions on policy clarification, interpretation, and/or application of policy and procedures should be addressed to Human Resources Services.

## 3. Introduction

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ICRISAT (“the Institute”) is committed to promote the highest ethical standards and maintain a workplace that facilitates open, transparent, fair and objective reporting of concerns/ violations of Protected Disclosures, Grievances and Complaints of discrimination, bullying, victimization and harassment (including sexual harassment). Thus, as part of the overarching Ethics and Safeguarding Framework, the Institute has formulated this ‘Concern Resolution Procedure’.

### 3.1 Objectives

The objectives of this document are as follows:

- I. To provide a mechanism for raising concerns/ violations relating to Protected Disclosures, Grievances and Complaints of discrimination, bullying, victimization and harassment (including sexual harassment) within the Institute.
- II. To promote a “Speak up” culture at the Institute and encourage workforce members to report any actual or suspected wrongdoings.
- III. To foster a sense of collective responsibility in safeguarding interests of the Institute.
- IV. To ensure that all workforce members treat each other with dignity, courtesy and respect at all times.

### 3.2 Scope and Applicability

All workforce members are eligible to raise concerns of Protected Disclosures, Grievances and Complaints of discrimination, bullying, victimization and harassment (including sexual harassment) following the procedures laid down in this document, regardless of their area of work or location or nature of their contract with the Institute.

## 4. Nature of Concerns

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The Concern Resolution Procedure can be used to raise concerns/complaints of the following nature:

- a. Grievances
- b. Protected Disclosures
- c. Complaints of discrimination, bullying, victimization and harassment (including sexual harassment)

### 4.1 Grievances

- I. A concern arising directly out of a workforce member's employment/ assignment contract with the Institute. There may be occasions where a workforce member feels that they have not received fair consideration in respect of employment/ assignment and wants to raise a grievance.
- II. This process can only be used for individual grievances.
- III. The process applies to, but is not limited to, grievances of following nature:
  - a. Disagreements over implementation of institutional policies
  - b. Grievances related to a workforce member's morale, or other workplace matters that do not implicate legal or ethical issues such as workload, working conditions, relationships at the workplace etc.;
  - c. Workforce member's individual grievances related to employment status or other matters related to terms and conditions of employment, for which other channels of redressal are not defined.

### 4.2 Protected Disclosure

- I. A Concern raised in good faith that discloses or demonstrates information that may evidence unethical or improper activity. The protected disclosures are governed by the Institute's 'Whistle Blowing & Protection from Retaliation Policy' and include (but are not limited to) the following:
  - a. Breach of the Institute's Ethics Policy;
  - b. Financial irregularities including financial statement fraud;
  - c. Incomplete declaration/ non declaration of Conflict of Interest;
  - d. Acts of bribery & corruption;
  - e. Negligence causing substantial and specific danger to the Institute's Financial assets health, safety and environment;
  - f. Manipulation of Institute's data/records;
  - g. Disclosure of confidential / proprietary information to unauthorized personnel;
  - h. Misappropriation of Institute's funds/ assets;
  - i. Abuse of authority, immunities or privileges granted to the workforce members;
  - j. Breach of any of the other Institute Policies;
  - k. Any other activities whether unethical or fraudulent in nature and injurious to the interests of the Institute;
  - l. Scientific fraud (e.g. data falsification, plagiarism) or ethical violation (e.g. regarding use of data, authorship rights);
- II. It is an obligation of all workforce members that, when they observe or become aware of any improper practice requiring the raising of a Protected Disclosure, they should bring it to the early attention of the Institute.

- III. Due to their nature, concerns of Protected Disclosure and Sexual Harassment can only be raised through a Formal Process, described in Section 4.3 of this document. However, if the workforce member needs support or advice, before raising such concerns through the Formal Process, they can reach out to the various sources of support mentioned in Section 4.3 of this document.

#### **4.3 Discrimination, Bullying, Victimization, Harassment (including sexualharassment)**

- I. The Institute does not tolerate discrimination or harassment on the basis of an individual's sex, gender, race, colour, national origin, age, religion, disability, sexual orientation etc. Through this procedure, not only unlawful harassment and discrimination, but concerns on other unprofessional and discourteous actions can also be raised.
- II. Concerns regarding discrimination, bullying, victimization, harassment (including sexual harassment) are governed by the Institute's 'Prevention of Discrimination & Harassment including Sexual Harassment Policy' and 'Gender Diversity & Inclusion Policy' which include among others following:
  - a. Unequal or unfair treatment of the workforce member/s based upon their personal characteristics;
  - b. Verbal or written abuse directed at a person;
  - c. Persistent, unsolicited or unwelcome requests for social / personal relations;
  - d. Oral abuse or derogatory comments based on individual's race, colour, national origin, religious beliefs etc.;
  - e. Inappropriate direct or indirect invitation for sexual engagement;
  - f. Deliberate exclusion of a person from the normal social activities of the workplace;
  - g. Intrusive enquiries into a workforce member's private life;
  - h. Reference to their sexuality or physical appearance;
  - i. Display of indecent images at the workplace, including accessing and/or distributing pornography;
  - j. Unwanted physical contact and advances;
  - k. Molestation;
  - l. Indecent exposure;
  - m. Sexual assault;
  - n. Unsolicited comments/ compliments inappropriate in a workplace context or sexual anecdotes.
- III. Workforce members are encouraged to raise Grievances and Complaints of harassment, discrimination, bullying, victimization etc. as early as possible. However, the Institute does recognize that sometimes due to the sensitive or personal nature of such concerns, the workforce member may initially want to pursue such concerns through the various channels and they can do so, through a Preliminary Process mentioned in Section 4.1 and 4.2 of this document.

## 5. Process of raising a concern

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### 5.1 Seek advice

- I. The Institute recognizes that it may be difficult for a workforce member to directly raise a concern/ complaint through the Preliminary or Formal process and therefore encourages the workforce members to access the appropriate sources of support available. However, this is not a mandatory step, and the workforce member can directly raise concerns using the Preliminary or Formal process as appropriate, without seeking any advice.
- II. In providing a range of sources of support, the Institute seeks to ensure that a workforce member who feel that they have either been subjected to harassment, discrimination, bullying, victimization or have a potential grievance or have experienced / witnessed a potential protected disclosure, are able to raise their concerns effectively, and to have them addressed appropriately.
- III. Advice and support can be sought from an immediate Supervisor or the Program HR Partner. All such advisors are bound by appropriate confidentiality agreements and any discussion, advice and information provided by them, as part of this process is confidential.
- IV. Confidentiality must also be maintained on the part of those seeking assistance from the designated advisors.
- V. After receiving advice, the workforce member can decide whether to pursue the concern or not. If the workforce member decides to pursue the concern, they can pursue as follows:
  - a. Grievance or complaints of harassment, discrimination, bullying, victimization can be pursued either through a Preliminary or Formal process;
  - b. Protected Disclosures and concerns of Sexual Harassment can be raised only through the Formal Process.
- VI. A concern must be raised through a Preliminary or Formal process within twelve (12) months from the date of the last incident i.e., when the individual witnessed or experienced the concern or from the date it came to the notice of the workforce member who wishes to raise the concern.
- VII. In exceptional circumstances, the time limits for raising concern may be extended as per Section
- VIII. 1.3 of this document.

### 5.2 Preliminary Process

- I. Grievance or complaints of harassment, discrimination, bullying and victimization can be raised through Preliminary process. A Preliminary process provides the opportunity to resolve any complaints or grievances in an open, honest, non-threatening, and non-contentious manner. It is preferable to avail the Preliminary process first before utilizing the Formal process. The Preliminary process includes the following options to the workforce members:
  - a. Consultation with immediate Supervisor
  - b. Consultation with Program HR Partner.
- II. Protected Disclosures and Grievance or complaints related to Sexual Harassment should be raised through the Formal process only.



### 5.2.a.1 Consultation with immediate Supervisor:

- i. A workforce member may consult the Supervisor if they feel that they are being subject to harassment, discrimination, bullying, victimization or may have concerns on implementation of institutional policies.
- ii. If the concern remains unresolved after consultation with the immediate Supervisor, the respective immediate Supervisor may refer the matter to the concerned Program HR Partner to take the resolution process forward.

### 5.2.a.2 Consultation with Program HR Partner

- I. A workforce member may consult the Program HR Partner if they feel that they are being subject to harassment, discrimination, bullying, victimization or may have concerns on a policy or have disagreement on a management decision.
- II. When consulted, the Program HR Partner shall inform the workforce member on their rights, provide advice on the various options available for them in the Concern Resolution Procedure, provide appropriate support within the Preliminary process, and where appropriate, provide mediation support in an impartial manner to bring the situation to a resolution that is satisfactory to all parties.
- III. If the workforce member is not satisfied with the outcome of the Preliminary process, the Program HR Partner can also provide advisory support for the Formal Process.

## 5.3 Formal Process

The workforce member may use the Formal Process directly, due to the nature of the concern or if they are dissatisfied with the result of the Preliminary process. Following procedures shall be followed for resolving concerns/complaints via Formal process:

### 5.3.a.1 Lodgment

- I. The workforce members can register a concern / complaint by emailing or calling the “Concern Line” or through the “Case Management Tool” (CMT) managed by an external agency, using the contact information provided in the *Appendix*.
- II. Workforce members are encouraged to disclose their identity while raising Formal concern/complaint. However, individuals may wish to raise concerns/complaints anonymously. It is mandatory for anonymous reports of alleged offence to provide substantive evidence. In absence of credible evidence, the reported concern would be dismissed without any further action.
- III. Any concerns/complaints raised anonymously, via a hard copy letter or email, shall not be considered for investigation. Although, if the complainant has disclosed their identity, they will be encouraged/ assisted to use the “Concern Line” or “Case Management Tool (CMT)”.
- IV. In the formal investigative process, strict confidentiality of the identity can only be maintained if the information provided confidentially can be corroborated independently. The Formal concern/complaint report should state:
  - a. The name of the alleged offender/subject;
  - b. The date(s) and location of the alleged incident(s); and
  - c. The names of witnesses and any physical and/or documentary proof, which corroborate the allegation (e.g. e-mails, text or voice messages, photos, letters etc.).

### 5.3.a.2 Preliminary inquiry and review

- I. Upon receipt of a Formal concern/complaint via the Concern Line or Case Management Tool (CMT) or email, the external vendor sends it to concerned Investigating Authority as follows:

Investigating Authority	Deputy Director General – Corporate Services	Director - Human Resources	Deputy Director General - Research	Governing Board through Chair, Audit and Risk Committee (ARC)
Nature of Concern	(1) Financial irregularity/ unethical Act; (2) Bribery and Corruption;  (3) Misappropriation of financial assets; (4) Any other Protected Disclosure of financial nature;	(1) Breach of Ethics Policy / breach of any organization policy of non-financial nature;  (2) Workplace or Sexual Harassment / discrimination/ Victimization/ Bullying; (3) Grievance;	(1) Scientific fraud, data falsification, plagiarism;	(1) Complaint / Protected disclosure against; Director General and workforce members reporting directly to the Director General

- I. Upon receipt of the Formal concern/complaint, the Investigating Authority shall provide the relevant details of the case to the Director General (DG) unless the case involves the DG or another Investigating Authority.
- II. The concerned Investigating Authority shall perform a Prima Facie review, in accordance with the Human Resources Management Policy 16.4(b)- Preliminary Inquiry, within 30 calendar days from the date of the case being allocated to them on the Case Management Tool to determine whether there is sufficient evidence to warrant further proceedings.
- III. If the concern/complaint raised is against the Director General (DG), the external Service Provider Agency shall send the details to the Chair of the Governing Board. In such cases the Chair of the Governing Board shall decide the alternate mechanism to investigate and resolve the issue.
- IV. If the Investigating Authority is found to have conflict of interest or declares a conflict of interest, he/she shall be removed from the inquiry process.

### 5.3.a.3 Detailed investigation

- I. Following the completion of preliminary inquiry and review, the Investigating Authority (IA) should provide a recommendation to the Director General as to whether to proceed to a detailed investigation or to close the case in absence of sufficient evidence.
- II. Based on the recommendation of the Investigating Authority (IA), the Director General shall decide whether to proceed with a detailed investigation or not, and shall communicate the decision to the Investigating Authority.
- III. Where the Director General decides for detailed investigation into the matter, the Director General can do so by instructing the Investigating Authority (IA) to proceed with the detailed investigation or by forming an Inquiry Committee to conduct the inquiry. The inquiry committee

- may include external experts or agencies if required. In case of complaints related to Sexual Harassment, an external panel member, who specializes in the subject is mandatory.
- IV. During Investigation, if the Investigating Authority or any member(s) is found to have conflict of interest or declares a conflict of interest, they shall be removed from the inquiry process.
  - V. The Director General may take following actions during the course of detailed investigations:
    - a. **Compulsory Leave:** The Director General may place the workforce member on **Compulsory Leave** during the full inquiry, but such leave shall not exceed a period of ninety (90) calendar days;
    - b. Salary and benefits shall continue to be paid during this period with the understanding that if the workforce member is eventually charged with misconduct it shall be recovered;
    - c. Placing a workforce member on compulsory leave shall not be treated as disciplinary action;
    - d. **Suspension:** If misconduct is considered to be gross, the Director General may place the workforce member on **Suspension** and initiate the disciplinary proceedings within a period of ten (10) calendar days.
    - e. The salary and the benefit of the suspended workforce member shall also stand suspended during the period of investigation;
    - f. In case the workforce member is eventually not charged with misconduct, the accrued salary and benefits for the suspended period shall be paid in full as arrears.
  - VI The workforce member being placed on Compulsory Leave or being Suspended shall be notified in writing;
  - VII The Detailed Investigation shall be concluded within a period of sixty (60) calendar days after initiation of proceedings.
  - VIII Inquiry Committee will be responsible for
    - a. Conduct the enquiry in a fair and unbiased manner;
    - b. Ensure complete fact-finding;
    - c. Maintain strict confidentiality, especially with regard to the complainant's identity (if available);
    - d. Reach an outcome for each inquiry;
    - e. Recommend an appropriate course of action as the form of redressal for every 'genuine' complaint raised under this Policy; and
    - f. Record deliberations in arriving at an outcome and maintain the final inquiry report for records.
- ii. Inquiry Committee or Investigating Authority, in the course of investigation, may:
- a. Call upon any workforce member to provide documents, emails and/or any other correspondence believed to have value in deciding the case;
  - b. Interview any workforce member who is believed to have knowledge of the events in question;
  - c. Consult any other person(s) outside the Institute, believed to have information or evidence of value, to support the investigation;
  - d. Workforce members are required to cooperate in the investigation and failure or refusal to do so shall constitute gross misconduct.

- iii. **Communication of Probable Misconduct:** When the person conducting the investigation has determined that prima facie a misconduct has been committed, the workforce member shall be notified, in writing, of the alleged misconduct and asked to provide an explanation within a stipulated period from the receipt of the notification.
- iv. **The Right to Respond:** A workforce member's response to the Investigating Authority may be oral if he/she so chooses. In such scenarios, the response can be recorded by the Investigating Authority. The workforce member will be permitted and can be required to answer the allegations in writing. The amount of time given to the workforce member to answer will consider the complexity and seriousness of the matter. If the workforce member does not respond within the time provided, ICRISAT will proceed with further actions on the basis that the workforce member has admitted the allegations and has no further explanations to offer.
- v. Where the Director General decides not to proceed with investigation, the Investigating Authority (IA) shall close the case in the Case Management Tool (CMT) with the required information.

#### 5.3.a.4 Decision and Notification

- I. Inquiry Committee/ Investigating Authority (IA), as the case may be, will share the investigation report with the Director General. The Director General will evaluate the report in line with Clause 16.5 and 16.6 of the HRMP. If required, appropriate action will be prescribed as per disciplinary procedures specified under Section 5.0 of this document.
- II. Subsequently, the Investigating Authority will close the case in the Case Management Tool (CMT) with suitable comments and information.
- III. The Investigating Authority shall send a consolidated quarterly report to the Director General (DG) and a Half-yearly report to the Governing Board (GB) which should be including, among others, the number of cases received, actions taken and status.

#### 5.3.a.5 Records retention

- I. A record of the information regarding disciplinary actions taken shall be retained in the personnel records of the workforce member.
- II. All relevant documents related to the inquiry will be recorded and retained by HRS for a period of 5 years from the closure of the inquiry process.

#### 5.3.a.6 Appeal against the decision

Any workforce member, against whom a disciplinary action has been taken, shall have the right to appeal in accordance with the 'Appeal Procedures' specified under Section 6.0.

## 6. Disciplinary Procedures

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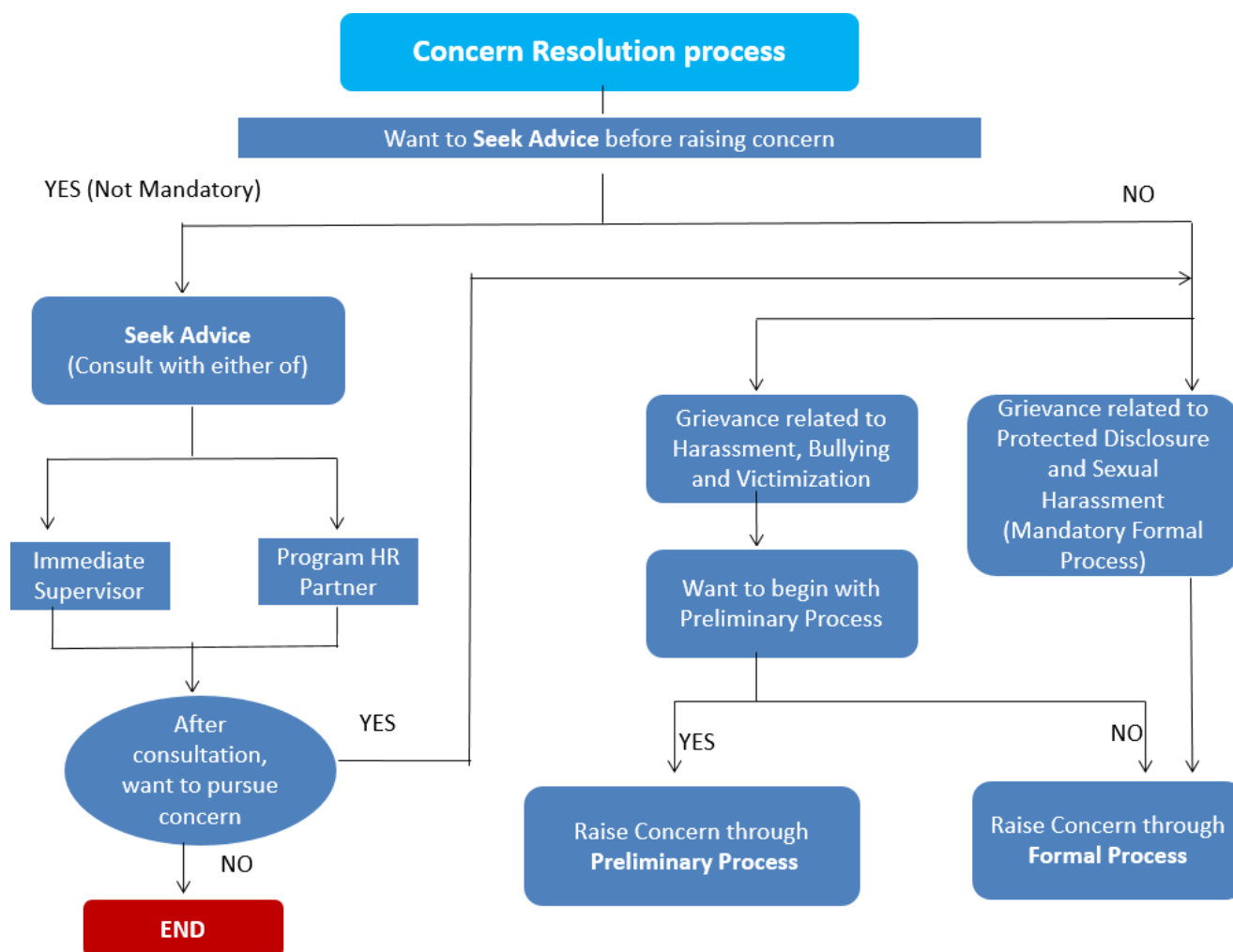
ICRISAT will take disciplinary action, whenever a misconduct or gross misconduct, which may or may not be intentional, is detected, as detailed below.

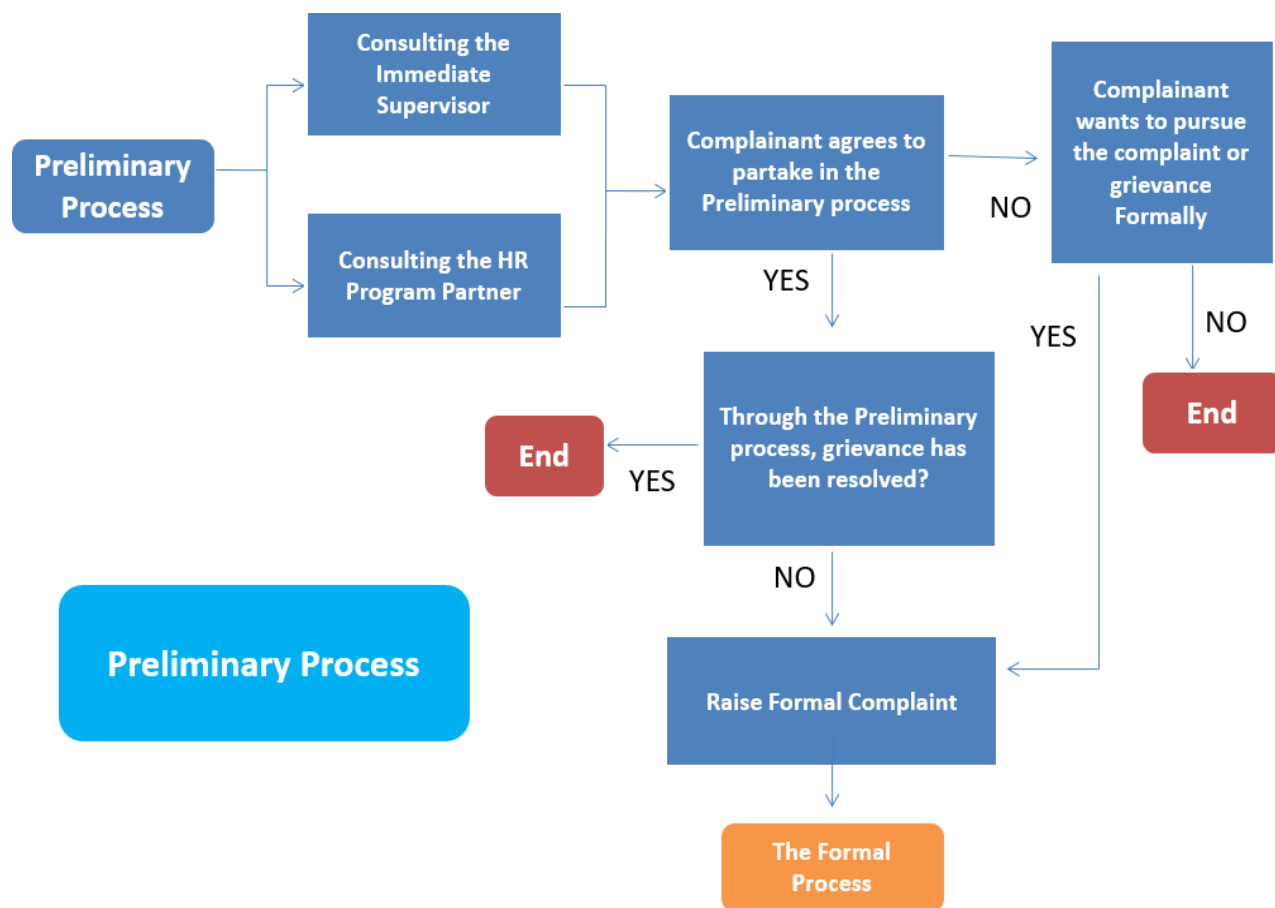
- I. Disciplinary actions imposed by ICRISAT shall be determined on a case-by-case basis, considering the seriousness of the matter, extenuating circumstances, and the interests of the Institute.
- II. Depending on the circumstances, one or more of the following disciplinary actions may be taken by ICRISAT when misconduct is determined to have occurred, provided the determination is made within three (3) years from the date the misconduct is discovered:
  - III. Oral warning that is appropriately recorded;
  - IV. Written warning with or without penalty;
  - V. Suspension from duty without pay
  - VI. Forfeiture of pay for current year or a prior year in which it is later determined that the misconduct occurred, either to penalise the workforce member or to compensate ICRISAT for losses attributable to such misconduct;
  - VII. Removal of authority, privileges, or benefits, whether permanently or for a period of time;
  - VIII. Termination of contract with or without notice period.

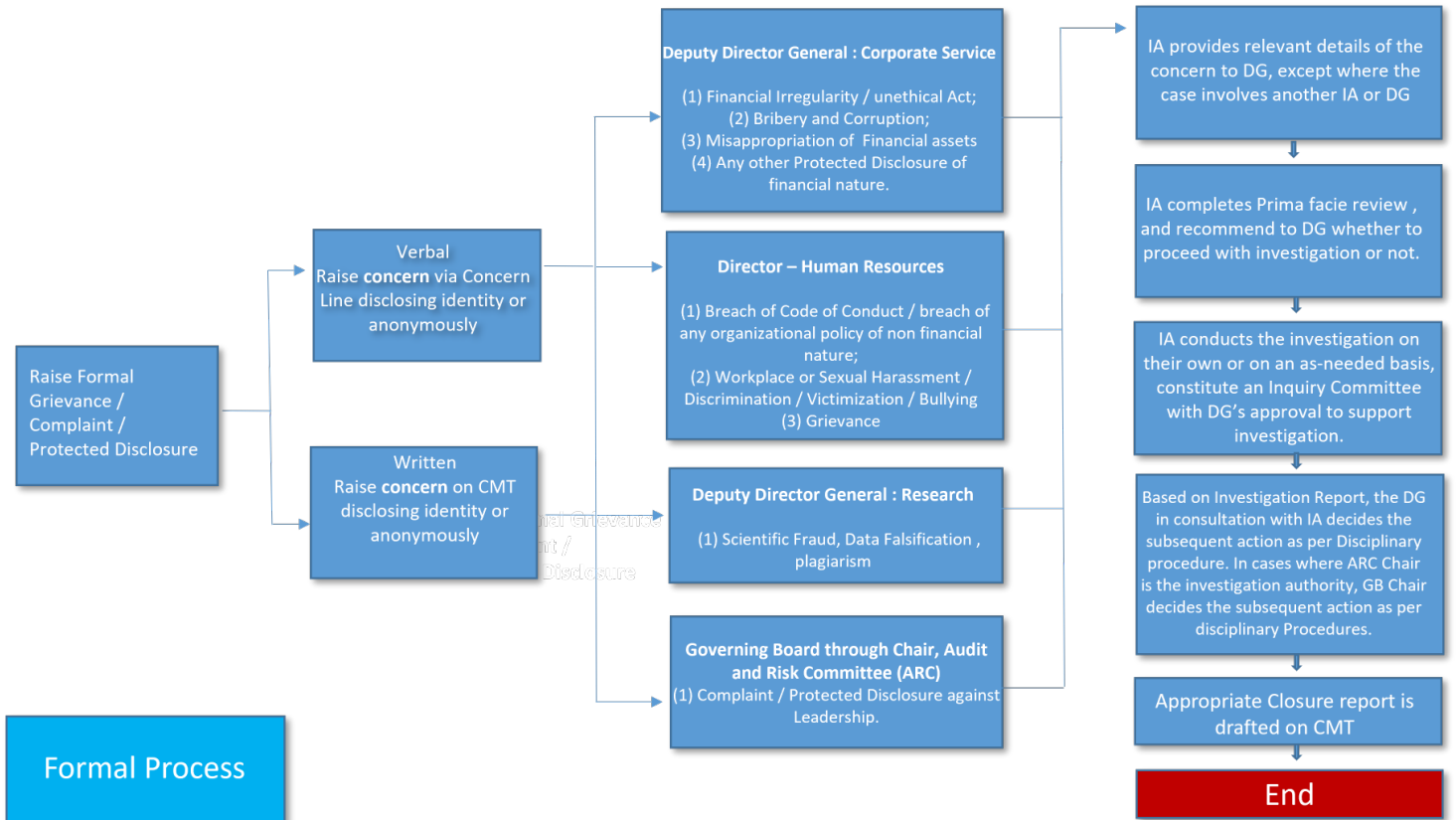
## 7. Appeal Procedure

Any workforce member, who has been subjected to disciplinary actions as per the disciplinary procedures and considers the decision and/or disciplinary action imposed unreasonable or unjust, he or she may lodge an appeal, within fifteen (15) calendar days from the date of the written notification of the decision as detailed in Human Resources Management Policy (HRMP) Clause 17.

## 8. Appendix









## 8.1 Concern Line Details

1. Make sure you have an outgoing call facility.
2. Enter the Access Code for the country and/or telephone system you are calling from. You will then hear a 'bong'.  
***(Refer Table 1)***
3. An English-language voice prompt will ask for the number you are calling.
4. Enter our toll-free number: 800-603-2869. There is no need to dial "1" before the toll-free number.
5. You are now connected to the hotline.
6. A Lighthouse greeting will be played in multiple languages. Make a choice from the pre-recorded language prompts ***(Refer Table 2)*** or press 000 and tell the English operator the language you speak (preferably in English). An interpreter will then join the call in 2 ± 3 minutes. The Lighthouse operator will interview you, aided by the interpreter.
7. A report in English is then sent to the designated recipient(s) of ICRISAT.
8. Access codes are subject to change.

**Table -1**

Access code for country and Direct Dial numbers		
Country	Access code for the country	Toll-free number
India	000-117	800-603-2869
Kenya	0-207-602-020	800-603-2869
Nigeria	0-708-060-1816	800-603-2869
Country	Direct Dial Numbers	
Malawi	001-833-332-0008	
Zimbabwe	001-833-332-0008	
Ethiopia	001-833-332-0008	
Mali	001-833-332-0008	
Niger	001-833-332-0008	
Mozambique	001-833-332-0008	

**Table -2**

Language and Language prompts			
Language	Language Prompt code	Language	Language prompt code
English	Press 1	Hungarian	Press 01
Spanish	Press 2	Polish	Press 02
French	Press 3	Dutch	Press 03
Mandarin	Press 4	Czech	Press 04
Cantonese	Press 4	Taiwanese	Press 05
German	Press 5	Korean	Press 06
Italian	Press 6	Tagalog	Press 07
Portuguese	Press 7	Vietnamese	Press 08
Japanese	Press 8	Indonesian	Press 09
Arabic	Press 9	Hebrew	Press 004
Finnish	Press 001	Turkish	Press 005
Russian	Press 002	Other	Press 000
Hindi	Press 003		

## 8.2 Case Management Tool (CMT)

Case Management Tool	
Website	URL
English Website	<a href="http://www.lighthousegoto.com/icrisat/eng">www.lighthousegoto.com/icrisat/eng</a>
French Website	<a href="http://www.lighthousegoto.com/icrisat/fre">www.lighthousegoto.com/icrisat/fre</a>
Hindi Website	<a href="http://www.lighthousegoto.com/icrisat/hin">www.lighthousegoto.com/icrisat/hin</a>

E-Mail	reports@lighthouse-services.com	<i>(must include ICRISAT name with report)</i>
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### 8.3 Key Terms

Throughout this document, the following terminology has been used as defined:

Term	Definition
<b>Appellate Authority</b>	Appellate authority means an authority appointed to review appeals as per the Human Resources Management Policy.
<b>Conflict of Interest</b>	Conflict of Interest refers to an actual, perceived or potential conflict where the personal interests of an ICRISAT workforce member may be in conflict (or perceived to be in conflict) with the interests of the Institute.
<b>Discrimination</b>	Discrimination is any distinction, exclusion, preference, or restriction based on, but not limited to, age, gender, disability, race, nationality, ethnic origin, religion, language, marital or civil partnership status, political beliefs or sexual orientation, where the purpose or result is to nullify or impair equal opportunity or treatment at work, such as hiring, working conditions, access to any employment benefit or condition, career development etc.
<b>Immediate Supervisor</b>	The next level supervisor of the concerned staff member as defined in the organizational structure.
<b>Policy Council</b>	A Council consisting of nominated members from the ICRISAT Executive Team, constituted for ensuring compliance with the policy management framework of ICRISAT.
<b>Program HR Partner</b>	Program HR Partner is a trained HR professional and is the HR point of contact for Ethics and Safeguarding framework and its underlying policies/ procedures/ guidelines including the Concern Resolution Procedure.
<b>Sexual harassment</b>	Sexual harassment is a particular form of harassment which includes sexual advances, request for sexual favors or unwanted verbal or physical conduct or gestures of a sexual nature, or any other behavior of a sexual nature (including pornography, sexually colored remarks) that has or that might reasonably be expected or be perceived to cause offense or humiliation to another.
<b>Subject</b>	A person or group of persons against, or in relation to whom, a Concern/ Complaint/ Protected Disclosure / Disclosure is made, or evidence gathered during the course of an enquiry under these procedures.
<b>Workplace harassment</b>	Workplace harassment is any improper behaviour and/ or conduct by a person that is directed at, and is offensive to, another individual or a group thereof and which the person knew or ought reasonably to have known would be offensive or be perceived to cause offence or humiliation to another.
<b>Workforce member</b>	Refers to particular individuals who have a contractual relationship with ICRISAT such as Staff Members, members of the Non-Regular Special Assignments category, Learner-Participants and Third-party contractors; regardless of their position, type of employment, or location. Assignments category, members of Short-term contracts, members of Job-contracts, Learner-Participants and Third-party contractors; regardless of their position, type of employment, or location. However, this does not include members of governing board.

#### **8.4 Reference Documents**

- a. [Human Resources Management Policy](#)
- b. [Human Resources Administrative Policy](#)
- c. [Ethics Policy](#)
- d. [Whistle Blowing and Protection from Retaliation Policy](#)
- e. [Prevention of Discrimination and Harassment, including Sexual Harassment Policy](#)
- f. [Conflict of Interest Policy](#)