

**March 6, 2023**

**To:** All Udall Foundation Employees  
**From:** David Brown, Executive Director  
**Subject:** Udall Foundation Policy on Sexual and Non-Sexual Harassment

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The Morris K. Udall and Stewart L. Udall Foundation (“Udall Foundation”) is committed to providing a workplace free from both sexual and non-sexual harassment.

Sexual harassment includes, but is not limited to, unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a condition of an individual's employment, (2) submission to or rejection of such conduct by an individual is used as the basis for career or employment decisions affecting such individual, or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment. Sexual harassment also includes offensive comments or behavior directed at a person because of his or her sex. Non-sexual harassment is unwelcome conduct based on race, color, religion, sex (including pregnancy, gender identity, and sexual orientation), national origin, age (40 or older), disability, or genetic information, and can also occur as retaliation for protected equal employment opportunity (EEO) activity.

The Udall Foundation will make every effort to address unwelcome conduct before it reaches the level of unlawful harassment. Harassment targeted at any individual or group will not be tolerated by the Udall Foundation. Employees must feel free to report such conduct without fear of retaliation. Employees who report harassment are assured that (1) the agency will protect the confidentiality of the individuals bringing harassment claims to the maximum extent possible, (2) the agency's complaint process will lead to a prompt, thorough, and impartial investigation, and (3) the agency will take immediate and appropriate corrective action when it determines that harassment has occurred. Any employee found to have engaged in harassment or discrimination will be subject to disciplinary action, up to and including removal from Federal service.

Every employee has a role in the prevention or elimination of harassment by (1) examining his/her behavior on the job, (2) supporting the Udall Foundation's policy on prevention of harassment, and (3) notifying his/her supervisor or higher-level manager when there is a concern. Managers and supervisors are held accountable for enforcing standards of appropriate office behavior and are expected to follow the guidelines and procedures as set forth in the Udall Foundation Policy and Procedures on Addressing Claims of Harassment.

Udall Foundation employees who believe they have been subjected to sexual or non-sexual harassment may initiate a complaint by contacting **the GSA Office of Civil Rights at (202) 501-0767 or [ocr@gsa.gov](mailto:ocr@gsa.gov)**. Employees who contact GSA to report a harassment complaint should remind the GSA intake official that the Udall Foundation has an interagency agreement with GSA to process such complaints. Once notice of the allegation has been transmitted to the Udall Foundation, the agency will begin an investigation within 10 days, with the Udall Foundation General Counsel serving as the intake official. Within 60 days of notice of the allegation, the agency will reach a decision and take any necessary corrective action, with a final determination made by the Udall Foundation Executive Director.