



## ESF INTERNAL CODE OF CONDUCT

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## CODE OF CONDUCT OF THE EUROPEAN SCIENCE FOUNDATION

The ESF follows the best practice guidelines of the European Charter for Researchers and the Code of Conduct for the Recruitment of Researchers. These guidelines are designed to promote equal rights and obligations for individual researchers throughout Europe by specifying the roles, responsibilities and entitlements of researchers, as well as those of funders and employers of researchers. They guarantee attractive research careers and improve the employment and working conditions of European researchers. The guidelines of the Charter and Code address all European research organisations and universities, both public and private. The European Commission has acknowledged the ESF's respect of these guidelines, which entitles it to use the 'HR Excellence in Research' logo.

The Foundation's values reflect the principles of the European Charter for Researchers and Code of Conduct for the Recruitment of Researchers:

- **Excellence:** the gatekeeper criterion for all scientific activities, it also drives the management philosophy and operating procedures;
- **Openness:** to all scientists and disciplines; no barriers between disciplines; open sharing of results; transparency to stakeholders and partners;
- **Responsiveness:** in its procedures and structure;
- **Pan-European and multi-cultural outlook:** rising above national interests to the benefit of science in the whole of Europe;
- **Ethical Awareness and Human Values:** sensitive to societal and ethical considerations in all its activities; attention to gender aspect.

This ESF Code of Conduct thus formally sets out the principles and ethics according to which the Foundation functions; how its members, staff and external partners can expect to be treated as a result, and what is in turn expected of them. It reflects the ESF's commitment to demonstrate ethical standards beyond those of legal compliance, and serves as a framework for decision-making and communication in the organisation.

All employees of the ESF will be expected to sign on to these principles and to apply them in their daily work; this includes permanent and temporary as well as agency staff. External providers will also have an obligation to work within them when collaborating with the Foundation.

## **I. Research Integrity**

The ESF is committed to achieving the highest quality science in Europe to drive progress in research and innovation. It provides services to the science community, including peer review, evaluation and conferences, as well as support career tracking. ESF also hosts five high-level expert boards and committees to support them in achieving their objectives. Its mission is thus to ensure the integrity of scientific research.

The ESF established a Member Organisation Forum on Research Integrity in 2008 involving 31 research-funding and performing organisations and ALLEA (All European Academies), and in July 2010 a 'European Code of Conduct for Research Integrity' was launched at the Second World Conference in Research Integrity. It is now a standard for self-regulation with clear recommendations and the intention to become the reference for research integrity throughout Europe, reflecting a Europe-wide agreement on principles and priorities for the research community. These basic principles include:

- Honesty in communication
- Objectivity and transparency
- Impartiality and independence
- Openness and accessibility
- Duty of care
- Fairness in providing references and giving credit, and
- Responsibility for the scientists and researchers of the future.

These principles govern all scientific activities; policies, processes and procedures should be designed and conducted to avoid negligence, haste, carelessness and inattention, and employers have a responsibility to ensure that a culture of research integrity prevails. This requires training and mentoring of collaborators and robust management methods.

### ***Research Integrity at the ESF***

In all the ESF's activities as described above (Peer Review, Evaluation, Research Conferences, etc.), these basic principles described must be observed: confidentiality, respect and care of collaborators and participants, care in observation and analysis.

Allegations of misconduct are investigated according to French law - fairly, rapidly and confidentially. Minor misdemeanours may not lead to formal charges, but misdemeanours leading to misrepresentation may be treated more seriously.

### ***Peer Review and Evaluation***

To ensure the respect of research integrity in Peer Review and Evaluation, the ESF has drawn up a comprehensive Peer Review Guide which presents the core principles underlying peer review and the main elements of the procedure followed at the ESF according to the *European Peer Review Guide – Integrating Policies and Practices into Coherent Procedures*, published by the ESF Member Organisation Forum on Peer Review (2011). These guides are designed to ensure the respect of research integrity in the carrying out of peer review and evaluation missions.

The ESF Peer Review Guide sets out the procedures, derived from the core principles, to guarantee research integrity and prevent misconduct. Quality criteria are set out to govern the eligibility of

proposals and the selection of review panel members; panel members are informed of evaluation criteria and detailed Terms of Reference; they are required to sign Declarations on Conflict of Interest and Non-Disclosure measures; they are informed of Data Protection directives. Quality and reliability of reports is monitored to ensure fairness of decision and quality of the research activities funded.

The quality of peer review services (such as for grant schemes and corporate foundations) and evaluation of institutes and national research schemes and research conferences must be at the highest level of objectivity and integrity. This requires the establishment of clear policies and procedures, training and mentoring of science managers, administrators and associates, and robust management methods preventing any transgression. ESF staff commit to the respect of documentation confidentiality (proposals, guidelines, meeting minutes, outcome of peer-review or evaluation activities etc.).

### ***Misconduct***

Scientific organisations failing to deal with research misconduct are failing in their responsibilities. Wrongdoings can be considered to include the fabrication, falsification or deliberate omission of unwelcome data, the failure to exercise proper duty of care, fairness or objectivity or proper standards of data management (use of faulty data, or incorrect procedures); breach of confidentiality; acting in conflict of interest; to knowingly plagiarise existing publications (plagiarism is defined as the act of using or closely imitating the language or ideas of another author and submitting them as one's own); attempting to cover up misdemeanours; or insufficient acknowledgement of contributors.

The response to a case of misconduct as described above depends on the seriousness of the misdemeanour; it must be demonstrated that it was committed intentionally, knowingly or recklessly. Proof must be based on the weight of evidence. Research misconduct should not include honest error, or differences of opinion.

Staff at the ESF must thus take responsibility for their own actions, but also be careful not to accept misconduct on the part of their associates, internal or external. Misconduct throws discredit on an organisation and leads to lack of trust on the part of all partners. It will be sanctioned by the ESF according to the disciplinary procedures laid down in the Internal Regulations.

## II. Equal Opportunities

The goal of the European Charter for Researchers is 'to contribute to the development of an attractive, open and sustainable European labour market for researchers, where the framework conditions allow for recruiting and retaining high quality researchers in environments conducive to effective performance and productivity'. Through their recruitment, appraisal methods and remuneration policies, European member states should create transparent, open, equal and internationally accepted systems of recruitment and career development.

The General Principles and Requirements applying to employers of researchers under the European Charter for Researchers include a non-discrimination clause:

'Employers and/or funders of researchers will not discriminate against researchers in any way on the basis of gender, age, ethnic, national or social origin, religion or belief, sexual orientation, language, disability, political opinion, social or economic condition'.

The dignity of each member of staff is thus protected, and the overriding principle is to protect him or her against xenophobia, sexism, homophobia and interference with civil liberties and trade union rights.

The ESF complies with these principles and requirements, respecting the dignity of its employees, and fulfils its social and legal responsibilities by having established equitable recruitment and employment processes and procedures. It values the diversity of its collaborators and seeks to provide an environment in which employees and partners alike can work in confidence and mutual respect. The ESF does not discriminate, nor allow its staff to discriminate, against any member of staff or applicant for employment or ex-employee on the basis of gender (including in the case of pregnancy, maternity or paternity), sexual orientation, age, ethnic, national, cultural or social origin, religion or belief, marital status, disability, political opinion, social or economic situation or health. Its remuneration policy is based on a position matrix, in which gender has no bearing.

### **Discrimination is defined as follows:**

Unequal or unfair treatment against any person or group is deemed to be discrimination under any of the categories listed above. Two types of discrimination are covered: direct and indirect.

- **Direct Discrimination:**  
Direct discrimination occurs when a person or group is treated less favourably than others.
- **Indirect Discrimination:**  
Indirect discrimination occurs when a measure which does not seem discriminatory in itself effectively disadvantages a certain group (through handicap or state of health, for instance).

Indirect discrimination is thus the discriminatory result of a measure that was not necessarily applied with a direct intention to discriminate and that cannot be objectively justified by the employer. (For example, a higher standard of language than that actually needed to do the job discriminates on the grounds of nationality/race; a training policy which excludes part-time staff may discriminate against women, who fill the majority of part-time positions.)

## **Gender Equality in Employment at the ESF:**

The ESF has drawn up an agreement with the Trade Union CFDT ('Confédération Française Démocratique du Travail', or French Democratic Confederation of Labour), "Accord sur l'égalité professionnelle hommes/femmes", or 'Agreement on Gender Equality in the Workplace'. This agreement is designed to ensure the professional equality of men and women in the organisation and sets progress targets and actions which are evaluated through performance indicators.. The Agreement concerns three main areas which provide performance indicators: recruitment, work/life balance and actual remuneration.

### **Recruitment:**

Selection criteria in recruitment are based strictly on competencies, professional experience and qualifications, and are identical for men and women alike. Job offers, for whatever position, are open to both men and women, and the terminology used in the text is carefully chosen so as not be discriminatory.

### **Work/life balance:**

Staff at the ESF, whether men or women, may choose to work part-time, and when a request for a reduction of working hours is received, a meeting is held with the staff member and his or her manager to evaluate the practicalities of a reorganisation of work in view of the activity involved. No prejudice is caused to the staff member by part-time work, either in terms of professional advancement, salary or mobility. Staff members finding themselves in difficult family circumstances necessitating a reduction in working hours are given special consideration.

### **Actual Remuneration:**

The ESF's remuneration policy is based on an agreement guaranteeing salary equality between men and women. Starting salaries for jobs at the same level are identical for men and women with the same qualifications and/or experience, and increases are based only on competency, professional experience, qualification and performance. A comparative analysis of the salaries of men and women according to professional category is carried out every year to check that gaps do not appear over time. The ESF has always sought to encourage equality in parenthood, and complements paternity benefits.

## **Employment of Disabled People at the ESF:**

The ESF fulfils its social obligations, engaging their services, or the services of specialised agencies for ad hoc missions (e.g. filling envelopes, electronic document management, archiving, gardening..), wherever possible. Should a member of staff become disabled, the ESF makes any adjustment possible and reasonable in order to maintain their services (for example by training, provision of special equipment, reduced working hours...).

## **The 'Accord sur l'Égalité Professionnelle Hommes/Femmes'**

Every employee is expected to comply with these principles, which are governed by the internal rules (Règlement Intérieur, or Internal Regulations) of the ESF. Non-compliance with these rules will be considered as misconduct and sanctioned according to the Internal Regulations.

### **III. Conflict of Interest**

In all its dealings, an organisation or institution must apply principles of objectivity and impartiality. A conflict of interest arises when an individual's interests (personal, financial or professional) interfere with the interests of the organisation. This may be in any field of activity, and may not always be clear-cut, but it should be borne in mind that it is the duty of every manager and staff member in the organisation to guarantee that the interests of the organisation are considered paramount.

This policy applies to

- members of ESF staff
- members of ESF governance
- review panel members
- evaluation committee members
- external associates of the ESF

#### ***Definitions***

A Conflict of Interest exists as soon as any of the above persons knowingly has a personal involvement or relationship with a project, person or institution performing an activity at the ESF. Personal interests may include current or future financial or professional gain, or involve preferential treatment or benefits in kind, or a potential for influence, either benefiting an individual staff member or his or her family or friend, or where goods or services are purchased from a friend or relative, or in the choice of a reviewer in the case of peer review. Financial reward may include the receipt of gifts, for which a staff member must seek authorisation from the Chief Executive.

#### ***Principles***

It is the responsibility of each and every member of staff to be aware of situations of conflict of interest based on internally established guidelines, approaching their work with a sense of responsibility and trustworthiness. Potential conflicts of interest should therefore be immediately reported to management. Many of these will have no impact at all when reported in a timely fashion, whereas even the slightest undeclared conflict of interest can have serious consequences for the reputation of both its beneficiary and the organisation. Should this be the case, the staff member concerned could potentially incur disciplinary measures against him/herself.

Authors, reviewers and editors must provide accurate, objective and justifiable assessments, maintaining their independence and declaring any conflict of interest, withdrawing from involvement or disclosing the conflict should there be one, and maintaining confidentiality. Reviewers should not use submitted material without permission, using these same guidelines when considering applications for funding, appointments, promotion or other recognition.

The prevention and management of conflicts of interest are the basis of equity and integrity in peer review. The ESF is committed to delivering assessments free of national, institutional or personal bias. The ESF has developed Conflict of Interest guidelines within the ESF Peer Review Guide, especially targeted to cases of real or potentially perceived vested interests, which will inevitably affect reviewers and Review Panel members from time to time.

### ***Dealing with Conflicts of Interest***

Collaborators approached to join Review Panels or Evaluation Committees will find the following statement in their letter of invitation or contract:

*“If you agree to this request to act as an expert regarding the specific activity referred to in this letter, it is assumed that you can be considered to be an independent expert in the field of this activity, and that no conflict of interest exists as referred to in the ESF Conflict of Interest policy. If this cannot be assumed, the ESF expects that you will report this – preferably by return correspondence – to the ESF so that another expert can be sought in good time. Should you have any doubts in this respect, please contact the relevant person at the ESF.”*

Panel members are required to sign a Declaration to the effect that they have no knowledge of a conflict of interest; that should one be detected they will immediately inform the ESF office; and that they will respect the rule of confidentiality throughout the selection process.

A Conflict of Interest must be officially declared:

- In the case of an external collaborator, the conflict of interest is declared to the appropriate member of ESF staff;
- In the case of an ESF staff member, the conflict of interest will be reported to the Chief Executive

Credible allegations should always be investigated. Investigations should be consistent with the French Labour Code, and be fair and speedy, leading to appropriate outcomes and sanctions. Confidentiality must be respected throughout the investigation, and the investigation carried out to completion even if the defaulter has left the organisation.

Partners in international collaboration (whether individuals or organisations) must agree beforehand to cooperate in potential investigations into such allegations.

## **IV. Information Technology**

The ESF provides the necessary tools for safe, secure and user-friendly electronic communication systems so that staff may work confidently in the knowledge that their files are constantly protected and backed up. Fast and effective anti-virus, anti-spam scans and intrusion protection stop malware and protect data; back-up and replication of data is fast; transfer of sensitive data off the network is monitored, and malicious and inappropriate websites are blocked.

The Foundation trusts its staff to use these systems sensibly and in a proper manner, aware that their actions reflect on the ESF as well as on themselves. The systems have been put in place to guarantee a safe and confidential business environment for all ESF staff. Personal internet usage must be kept to a reasonable level, and any abuse sanctioned according to the disciplinary procedures laid out in the Internal Regulations. Sites considered unsafe or unsuitable are blocked. The ESF reserves the right to limit or prevent access to certain sites. Use of software or electronic documents from outside the ESF without prior notification and approval of the IT team is strictly prohibited.

Employees must constantly bear in mind that e-mail messages are in the public domain; opinions or facts expressed in such communication may bind the individual and even the ESF in the same way as a printed document. It is important to verify the accuracy of information communicated about other people or organisations. Personal opinions beyond those of a professional nature should be withheld, and it should be remembered that comments expressed in writing may be (mis)understood as offensive, derogatory or discriminatory. Confidential or classified information must be treated as such, and not distributed thoughtlessly over the internet. It is also important to remember that information accessed or transferred over the internet or by e-mail leaves an indelible trace. A general control of mail boxes may be carried out based on factors such as frequency of use or size of attachments. Should abuse of the e-mail system be detected, disciplinary proceedings may ensue.

## **V. Spending of Allocated Funds/Accountability/Representation/ Delegation of Authority**

As a privately held, non-profit organisation financed by public funds, the ESF has a duty to ensure that such funds are spent efficiently and without waste, according to determined budgets.

The standards to be applied in the management of these funds include:

Integrity

Transparency

Accuracy

Accountability

and are to be carried out in the spirit and to the letter of the law, in the public interest and to high ethical standards.

All ESF staff will thus familiarise themselves with the financial and budgetary rules operating within the Foundation and will be particularly aware of the constraints imposed by the need for respect of the use of public money in research projects, and the individual accountability implied by the spending of such funds.

The Department of Administration and Finance (DAF) lays down the procedures, controls and reporting schedules to guarantee proper budget management and use of funds. The ESF Chief Executive may delegate financial authority to staff in charge of dedicated activities and responsible for the corresponding budgets. All transactions must conform both to applicable legal requirements and to the ESF's internal controls. Non-compliance with these regulations and controls is a serious offence and will be sanctioned according to the disciplinary procedures laid down in the Internal Regulations.

There are various financial audit mechanisms in place at the ESF to verify the use of funds according to objectives, and to ensure compliance with its regulations and ethical values: scientific reviews and committees oversee science activities and instruments (for which there are separate guidelines), while the DAF operates internal financial management and control over operations. In line with legal requirements the ESF financial situation and accounts are reviewed and certified by statutory auditors on a yearly basis. The Finance and Audit Committee (FAC) is the oversight body advising the ESF Governing Council in audit and financial matters, as defined in its dedicated remit. To address specific issues, it can commission certain procedures to external auditors, as can the ESF Chief Executive in the execution of his mandate. In addition, regular certification of the reports provided by the ESF in the frame of European Commission (EC) contracts is also carried out by the ESF statutory auditors. Audits can also be carried out by the EC or the European Court of Auditors. These mechanisms ensure the correct use of public funds in line with the objectives of the ESF and of the relevant programmes.

All employees are directly accountable for their part in the management of budgets or in the use and spending of funds; should they have any doubt as to the legitimacy of any payment they should contact the Department of Administration and Finance for clarification.

Selection of suppliers follows a tendering procedure, comparing at least three suppliers before final selection of the best one, and following negotiation. Accepting a personal payment, inducement, gift or recognition of loyalty (constituting a bribe or other form of influence) from a company seeking to establish or maintain a business relationship with the ESF is not permitted, unless with the express approval of the Chief Executive or of the Director of Administration and Finance.

The Chief Executive may delegate his/her authority to nominated members of staff, according to the document 'Delegated Authority'.

## VI. Data Protection

The ESF is registered with the French 'Commission Nationale de l'Informatique et des Libertés (CNIL)' (National Commission for Data Processing and Privacy), and is represented in its dealings with it by a dedicated member of staff, a Data Protection Officer (DPO) who mediates between the Commission and the organisation, occupying a consultative role in both directions. Every ESF staff member is entered into the ESF personnel databases as well as into the ESF's contact database (as are also external collaborators). As soon as they are registered, they automatically receive a letter to inform them that their personal data is held in this way. Staff subsequently receive a presentation of the databases and records used by the ESF and the procedures governing their use and access. These procedures are based on French law and European directives concerning information processing, electronic files and civil liberties.

### The CNIL

The CNIL lays down five main principles for the protection of personal data:

1. The principle of specified purpose: data must only be collected for a defined and legitimate use
2. The principle of proportionality of data: these must be relevant and necessary to purpose
3. The principle of limited duration for data retention: data must not be kept indefinitely
4. The principle of security and confidentiality of data: the employer is required to guarantee the confidentiality of data
5. The principle of respect of human rights: individuals must be informed of the relevance of and need for the use of their data and to whom it is available; they have the right to enquire as to what personal information is held on record, and to amend or remove any false information. They also have the right to refuse, for legitimate reasons, the entering of personal data not legally obligatory (e.g. publication of a photograph, or dissemination of their professional details).

It also defines the following terms:

Personal data: "any information relating to a natural person who is or can be identified, directly or indirectly, by reference to an identification number or to one or more factors specific to him or her. In order to determine whether a person is identifiable, all the means that the data controller or any other person uses or may have access to should be taken into consideration"

- (Article 2 of Act 78-17 of 6<sup>th</sup> January 1978 on Information Technology, Data Files and Civil Liberties – English version).

Sensitive data: "personal data that reveals, directly or indirectly, the racial and ethnic origins, the political, philosophical, religious opinions or trade union affiliation of persons, or related to their health or sexual life is prohibited"

- (Article 8 of the above Act).

The role of the CNIL, which is independent, is to verify that these principles are applied and to ensure that the law is properly respected. It also advises and informs both individuals and organisations of their rights and duties. It checks the declarations it receives for compliance, and deals with complaints of non-compliance. It is authorised to visit professional offices, check documents, information and electronic data. The CNIL may give warnings, impose sanctions and fines and report offences to the relevant courts.

## **Data Protection at the ESF**

The details of ESF staff members are entered into the main ESF database (which may display some professional details on both intranet and extranet) as well as into dedicated HR databases (which hold personal data necessary for pay systems and HR management). These data are under no circumstances used for commercial purposes. As mentioned above, employees are entitled to update their personal data and request that it be modified, deleted, etc.

The IT department works closely with the DPO to ensure that all personal data is protected, for example if new software is requested or acquired. Staff members wishing to suggest improvements or new features to the database must first of all contact the Database Coordinator and DPO, who will discuss these and plan their implementation (if feasible) in close collaboration with the IT department.

The IT department ensures that systems used by the ESF comply with the requirements of the Data Protection Act. It sets authorisation levels and authentication procedures so that users can only access data needed to accomplish their mission; users must identify themselves by a personal identifier (only available to themselves) along with a password. Passwords have a limited lifespan and users are forced by the system to change them regularly. Passwords should never be communicated to another party.

Should any questionnaire or registration or assessment form or similar, bearing personal data, be generated outside of the ESF database, the DPO must be consulted to ensure that the regulations of the CNIL are respected.

## **Responsibility of staff**

The communication of personal data must be secured to guarantee its confidentiality, integrity and authenticity. Electronic messaging and faxing are not generally speaking a secure means of communication. A wrong email address or fax number can result in the disclosure of personal information to non-authorised recipients and therefore breach personal privacy. Password-protected files should not be sent with their passwords!

Attention should also be given to verbal as well as written communication: for example, if asked for the address and telephone number of a staff member or external collaborator, it must be remembered that personal and private details may NOT be communicated; the staff member or external collaborator in question should be contacted and asked either for his/her permission to supply the information to the enquirer, or to contact the enquirer directly themselves.

Staff should be aware that some countries do not apply the same Data Protection rules as found within the members of the European Community, and extreme care should be taken in the transfer of personal data to and from such countries. The DPO should be consulted before any such transfer of personal data in order to authorise it.

The multiplication of laptops, USB keys and smartphones makes it necessary to plan for the possible loss of information resulting from the theft of such equipment. Protection by strong passwords or encryption is advisable; personal data should not be transported in mobile equipment during trips; should data be collected on mobile devices, these should be equipped with an automatic locking facility. (Laptops are sometimes equipped with a digital fingerprint reader; use of such a device in France is subject to an authorisation from the CNIL.)

## **VII. Harassment and Bullying**

No employee should suffer harassment in any form. Harassment can be defined as treatment intended to demean the individual or to adversely affect his/her working conditions, rights, dignity, mental or physical health or career based on gender, age, ethnic, national or social origin, religion or belief, sexual orientation, language, disability, political opinion, social or economic condition. French employment law protects an employee suffering such harassment from any sanctions, dismissal, or suffering discriminatory measures such as concerning salary, training, change of category, posting, qualification, promotion, transfer or renewal of contract as a result of (or refusing to be the subject of) repeated incidents of harassment, or of witnessing or reporting such harassment.

Management will take all necessary action to prevent incidences of any type of harassment. Any employee having been the perpetrator of harassment will incur disciplinary proceedings.

## **VIII. Conflict Resolution and Complaints/Appeals**

The ESF's commitment is to provide a calm, comfortable and professional environment in which all members of staff may use their skills and creativity to the maximum. Conflict is a normal ingredient in human relations, and should not always be considered as negative: it can be healthy, potentially nurturing original ideas and creativity. However, it should always be promptly addressed so that it does not become negative or toxic, affecting not only those involved directly but those around them. It will quickly become counter-productive and lead to dissatisfaction, stress and absenteeism. It is the responsibility of a manager to resolve any conflict, in some cases resorting to a formal conflict resolution procedure.

In the first instance, the manager will serve as mediator and arrange an informal meeting with both parties so that they may freely discuss the problem. Usually, this will suffice to settle the disagreement. Only if it persists will the formal procedure be invoked.

Should a member of staff wish to make a formal complaint about his/her treatment by management, the first step will be to discuss this with his/her manager and/or the HR department. Should the problem not be settled in this meeting, it will be taken to the HR department which will intervene and if necessary take the matter to appeal to the Chief Executive.

## **IX. Protection of Assets**

Each ESF staff member is responsible for the care of the company's assets in his/her charge and under his/her control. These assets include such property as office furnishings, computers, telephones and mobile phones, equipment and office supplies provided, as well as software, files and funds made available to him/her.

Records of these assets are kept by the ESF, and staff may be required to answer for those in their care. Regular audits are carried out for receipt and expenditure of funds. The ESF's assets, tangible or intangible, must not be used for any unauthorised non-business purpose or for personal gain. In the same way, staff must not divulge any confidential information to any individual or external organisation without prior permission.

## **X. Internal Regulations**

The Internal Regulations (Règlement Intérieur) describe:

- how the laws on Health and Safety are applied within the organisation
- general provisions related to discipline
- rules concerning the defence of employees' rights and their protection as victims of or witnesses to moral or sexual harassment.

I declare that I have read the above ESF Code of Conduct and agree to abide by its principles.

.....  
Date

.....  
Signature

.....  
Name