

Enforcement of the ACL Anti-Harassment Policy — Implementation

Approved by the ACL Exec, 2018-12-12

Background

In 2016, ACL adopted an anti-harassment policy, based on that of NAACL, for its conferences: [https://aclweb.org/adminwiki/index.php?title=Anti-Harassment Policy](https://aclweb.org/adminwiki/index.php?title=Anti-Harassment_Policy)

The present document sets out a framework for enforcement of this policy, with procedures to follow if complaints are raised under the policy. The goals are:

1. Identify the roles required within ACL to properly handle complaints, in the case of behavior at any ACL conference, associated event, or in ACL-affiliated online discussions.
2. Lay out procedures so that the people charged with handling complaints have guidance as to what action to take, and so that the complainant and respondent know what to expect.
3. Ensure that the procedures give the policy “teeth” — otherwise, it won’t serve its stated function of making sure that ACL events provide fora for “open exchange of ideas, the freedom of thought and expression, and respectful scientific debate”.
4. Ensure that the procedures are set up to protect the privacy of individuals involved, to the extent possible and reasonable.
5. Provide due process and fairness for both complainants and respondents.

Terminology

Complainant: A person who brings a complaint under the anti-harassment policy. (A Complainant need not be a member of the ACL. For example, a Complainant could be an employee of a conference venue or a non-member who has submitted a paper to an ACL conference or journal.)

Respondent: A member, employee, or non-member of the ACL who is named in such a complaint as having violated the policy. (In the case of a non-member, the sanctions that can be applied if the complaint is upheld might be limited to restrictions on future involvement with ACL.)

Professional Conduct Committee (PCC): The (new) committee of the ACL charged with responding to complaints.

Exec: The ACL Executive Board.

Preparation

1. Local organizers of a conference will collect information about how to contact local emergency services (police, fire, ambulance). We mention this in this document because in extreme cases, calling the police may be the appropriate response. This information should also be included in the conference handbook, as it is relevant in general (not just for cases of harassment that rise to the level of needing police intervention).
2. The registration form should ask for email and phone contact information that will allow ACL staff to contact attendees during the conference if necessary, and indicate that such contact information will not be published or shared beyond the ACL staff and committee members. (This is useful for organizers quite apart from the issues dealt with here.)
3. The Exec will bootstrap the PCC by appointing a person or persons as initial chair(s) to organize an initial call for members, training, etc.
4. The initial chairs will develop an incident reporting form, and will recruit a group of ACL members to serve on the Professional Conduct Committee.
5. The ACL will provide mediation training and other appropriate training (by bringing in outside trainers to ACL) to members willing to serve on the PCC.
6. A statement of possible consequences and how they are decided will be attached to the registration form for all ACL-sponsored events, so that registrants are aware of these (as well as the anti-harassment policy itself) at the time of registration, and registrants will be required to check a box to indicate that they accept and agree to follow the policy. This statement should also include a statement of what information is maintained and by whom. Suggested text:

“Conduct that violates the ACL’s anti-harassment policy may lead to sanctions from the ACL including removal from the event without repayment of registration, ineligibility to register for future ACL events, and ineligibility to serve on the ACL Exec or Chapter Boards or to become an ACL Fellow or Lifetime Achievement Award winner. Records of complaints raised and how they are resolved will be maintained by the ACL and accessible to the committee charged with resolving such complaints. Furthermore, information about sanctions applied will be maintained so that ACL office staff can verify whether registrants, invited speakers, and nominees are in fact eligible. The PCC and ACL office staff will act to protect the privacy of both Complainants and Respondents, to the extent feasible.”

Professional Conduct Committee

The Professional Conduct Committee¹ will be composed of 4–12 members of the ACL, who will each agree to serve 3-year (renewable) terms. The PCC will necessarily include ACL office staff, both in their role as front-line people at conferences and in order to manage possible sanctions. The PCC acts with authority from the ACL Exec, and is responsible to the Exec.

PCC membership is a volunteer position. All PCC volunteers must satisfactorily complete a training course (sponsored by the ACL) to become a member of the committee. This course will need to be offered regularly (annually?) so that new PCC members can be trained as they come on board. Continuing members should be welcome to attend additional trainings. PCC members should be relatively senior, so that they can operate relatively free of fear of retribution, and from different locations and institutions, to provide perspectives representative of the membership. The Committee should have enough members at any given time to allow for three members to discuss any given case even after those with conflicts of interest have recused themselves. Committee members found to be breaching confidence or handling complaints in a capricious fashion can be removed from the PCC by the ACL Exec.

The PCC will be overseen by a chair (or two co-chairs), appointed by and responsible to the Exec, who will serve five-year (renewable) terms. The PCC chair would normally be a chosen from current or past PCC members. The PCC chair is responsible for oversight of the committee, including:

1. Recruiting new members.
2. Arranging training sessions for new members.
3. Recruiting and liaising with trainers.
4. Ensuring that each case handled by the PCC is properly handled and documented.

Privacy

1. The PCC will act to protect the privacy of both Complainants and Respondents, to the extent feasible and reasonable. The main constraints on this are that the PCC cannot take action on a complaint without revealing the complaint to the

¹ The name is not intended to imply that the committee covers all aspects of professional conduct that the ACL might have an interest in. For example, it does not cover plagiarism in ACL publications. Rather, the name reflects the fact that harassment is one kind of violation of professional conduct. It is possible that in the future the Exec could expand the role of the committee to cover other areas of conduct. An alternative name for the committee could be the Professional **Misconduct** Committee, but this has derogatory connotations.

Respondent, in which case it will likely be impossible to protect the identity of the Complainant. Conversely, in cases where formal sanctions are applied, the fact of the sanctions (though not the details of the complaint) may become known to other event organizers, as specified below.

2. Complainants will be advised before information regarding their complaint is shared. If the Complainant does not wish the information to be shared, that may stop the Committee from taking any action.
3. Information will not be shared beyond the PCC and Respondent of the complaint by PCC members, ACL Exec members approached by the Complainant, or ACL staff. The only exception is in cases where the PCC decides that formal consequences are required, as specified below.
4. If a Complainant wishes the PCC to take action, the Respondent of the complaint will be informed.
5. At that time, the Respondent of the complaint will be informed also that the information is being kept in confidence, accessible only to the PCC (with exceptions noted below). But the Committee cannot require that the Complainant keep the information confidential.

Handling complaints

Complaints will be considered only if received within 365 days of the alleged incident, or [as a transition measure] if the alleged incident occurred between 2016-10-18 and 2018-12-12.

If a complaint is received at an event about behavior at that event, the PCC should act swiftly, in order to speak with all involved while they are still at the event, and to resolve the matter as rapidly as possible, but without compromising fairness or due process. If a complaint is received too late or after the relevant event, or if it concerns behavior online or not connected with an event, then the PCC will normally communicate with the Complainant and Respondent by email, telephone, or Skype.

Conference organizers and ACL office staff should be aware, through registrations, of which PCC members are present at the event and how they can be rapidly contacted.

Any PCC member might have a conflict of interest, or perceived conflict of interest, in the handling of a complaint. Definite conflicts of interest include being a current or prior collaborator, colleague, or co-author of the Complainant or Respondent; a member with such a conflict of interest, or who feels for any reason that they cannot be neutral and impartial, must recuse themselves from the case. Possible or perceived conflicts of interest

may also arise from the member being a friend or professional associate of the Complainant or Respondent. At the outset of the handling of any case, PCC members who are involved must declare any possible perceived conflicts of interest to both the Complainant and Respondent and recuse themselves if either is uncomfortable with the situation.

1. If at a conference, a Complainant may bring a complaint to any available member of the PCC. In order to refer Complainants if approached, conference organizers and ACL office staff should be aware of which PCC members are present at a conference and how to contact them; ideally, members of the ACL Exec and Chapter Boards would also be able to refer a Complainant to a PCC member. If not at a conference, a Complainant should bring a complaint to the chair or co-chair of the PCC.
2. A PCC member works with the Complainant to
 - a. Fill out the incident report form, including details of any witnesses and other evidence. Witnesses may also be interviewed.
 - b. Determine which of the following courses of action is appropriate:
 - i. Contacting local emergency services.
 - ii. Taking no further action (if the Complainant wishes).
 - iii. Informal mediation.
 - iv. Formal consideration by the PCC.
3. If no further action is taken, the incident report is not maintained.
4. In case actions iii or iv are chosen:
 - a. The PCC contacts the Respondent, informs them in writing of the complaint, and asks for their side of the story, including any witnesses and other evidence. This could result in a written document, either written by or reviewed by the Respondent. Witnesses may also be interviewed.
 - b. If iii, the PCC works with both people to attempt mediation. If this is not successful, the PCC together with the complainant may choose to move to iv.
 - c. If iv, at least three members of the PCC, including the chair or co-chair if available, meet together to determine if any sanctions are warranted, and if so, which. In the process, the PCC should contact the ACL office to see if there are any other incidents that have been reported involving the same individual as well as any incidents in which the Complainant has been found to have used the policy vexatiously. If so, the incident reports, with the Complainant's name redacted, will be shared with the members of the PCC handling the current complaint.
 - d. The PCC may dismiss a complaint as unfounded, and, further, may find it to be vexatious. If the complaint is found to be vexatious, the PCC will then determine if sanctions are warranted for vexatious use of the policy, and if so, which.

- e. The incident report, the document representing the other side of the story, and a report of what the outcome was, is filed with the ACL office by the PCC, except in cases where the Complaint is dismissed as unfounded or vexatious. In the case of vexatious requests, an incident report documenting the misuse of the policy should instead be maintained. Incident reports and any further documentation will be made available to both Complainant and Respondent.

If at any time in an investigation, the PCC feels for any reason unable to handle the situation well, it may, at ACL's expense, call on an outside consultant who specializes in workplace conflict and mediation to assist in, or take over, the investigation. The consultant's findings and recommendations will not be binding on ACL, but neither may they be unreasonably ignored or dismissed.

Possible Sanctions

If, as a result of its investigation, the PCC determines that sanctions against a Respondent are warranted, it will inform the Exec of its recommendation. Except in a situation in which the PCC determines that immediate action is needed (the expulsion of the Respondent from an event), the Exec will vote on the PCC's recommendation, and, if it is accepted, inform the Respondent accordingly. *In a situation in which immediate action is deemed necessary, the PCC may act with the authority of the Exec to implement the sanction, but must inform the Exec of its action as rapidly as possible.*

In all considerations of sanctions, the PCC should take into account the degree of seriousness of the offense and the likelihood of the Respondent re-offending. Sanctions may include, but are not limited to, the following:

1. A formal reprimand from the ACL Exec — that is, a letter from the Exec to the Respondent informing them that their behavior has been found to be in violation of the anti-harassment policy, and warning them that any new violations will lead to stronger sanctions.
2. Expulsion from current event, even if this entails the Respondent being unable to present a scheduled paper. This should be listed in the policy as a possible consequence in general, but is unlikely to be implemented in practice because the process of determining the sanction would be unlikely to finish in time.
3. Being barred from some number of future ACL events even if this entails the Respondent being unable to present an accepted paper. To which events and for how long the sanction applies will be at the discretion of the Exec on the recommendation of the PCC.

- a. For ordinary registration, in the event that there are people who are barred from registering, this information should be stored in a secure location. ACL office staff will review registrations against the list of individuals barred from registering and deregister (and refund) individuals who should not have registered.
 - b. Invited speakers should similarly be checked against such a list, and contacted directly. This will allow them to withdraw from the event for unspecified reasons, rather than having office staff tell event organizers that the proposed speaker is barred because of this policy.
4. Being barred from serving on the ACL Executive Committee, Chapter Boards or SIG Boards, becoming an ACL Fellow or receiving the Lifetime Achievement Award, for some specified period of time. This entails that the Nominating Committee for these roles must ask the ACL office staff if any proposed candidates are barred from receiving the awards. This should be done only in cases where the ACL member is a contender for Fellow or LTA. Again, the ACL office staff will only provide the information that the award is not allowed, and will not provide any details of the Complaint.
5. The Exec, in addition to or independently of other sanctions, may contact the Respondent's home institution, starting with the appropriate office (e.g., a Title IX office within a US institution or a Confidence Person in Europe). The ACL will not have control over what happens with the information within the individual's home institution at that point.
6. A Respondent who fails to respect a sanction — for example, by refusing to leave an event from which they have been expelled; by willfully registering or attempting to register for an ACL event while under sanction; or by accepting an invitation to speak at an ACL event while under sanction — may be further sanctioned.

Appeals

A Complainant or Respondent who is dissatisfied with the outcome of a case may appeal to the Exec, which may, at its discretion, order a new investigation by other PCC members or by an outside consultant.

Association for Computational Linguistics
Professional Conduct Committee
Incident Report

1. Name of Complainant:

2. Address and contact information:

3. Place of work or organizational affiliation:

4. Name of Respondent, and any known contact details:

5. Date and location of conference or incident:

6. Description of the situation (**dates, words, actions, etc.**) and impact (**e.g., humiliated, intimidated**)

7. How did Complainant react to the unwelcome behaviour?

8. Did anyone witness the incident(s)? Yes/ No? If yes:

a) Name(s) of witness(es) and contact information:

b) Description of the witnesses' respective role in the incident.

9. If applicable, describe any incident(s) that took place previously.

I hereby certify that to the best of my knowledge the above-mentioned information is true, accurate and complete. I understand that making false or frivolous allegations is in violation of *the Association for Computational Linguistics Anti-Harassment Policy* and may be subject to disciplinary sanctions.

Signature of the Complainant

Date

Signature of the PCC member

Date

Draft Professional Conduct Committee (PCC) Member Statement/Documentation

(to accompany signed complaint form)

1. Name and Contact Information for PCC Member conducting intake:

2. Relationship, if any, between PCC member and Complainant or Respondent (professional or personal): _____

3. Were the process options discussed with the Complainant? Yes/No

4. What course of action was selected/taken?

i. Contact local emergency services	Yes/No	Notes: _____ _____ _____ _____
ii. Take no further action (if Complainant wishes)	Yes/No	Notes: _____ _____ _____ _____
iii. Informal mediation	Yes/No	Notes: _____ _____ _____ _____
iv. Formal Consideration by Complaint Committee	Yes/No	Notes: _____ _____ _____

		<hr/> <hr/>
--	--	-------------

5. If iii) or iv) selected, date that Respondent was notified: _____

Signature of PCC Member

Date