



# BCDSS Antidiscrimination Policy

Regulations, Support & Complaints  
Procedures

**MARCH 2024**

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# Preface

This anti-discrimination policy follows from the BCDSS's commitment to counter identity-based discrimination and harassment in research and teaching environments. Building on the analytical concept of asymmetrical dependency developed at the BCDSS and its expertise on intersectionality, this policy puts forward a definition of discrimination based on age, ethnicity, nationality, race, gender & sexuality, religion or belief, physical and mental ability, and socioeconomic background. The document outlines the procedures for addressing incidents of sexual harassment, bullying, and discrimination based on identity.

The policy was initially drafted by the Diversity, Equity, and Inclusion (DEI) Coordinator at the BCDSS. It underwent review by the DEI Working Group and was subsequently approved for publication by the Steering Committee in June 2023. The current policy is a revised version released in March 2024. It amends the sections defining discrimination based on Religion, and Gender and Sexuality. It also includes the BCDSS's policy on Language use to promote diversity, equity and inclusion in the context of produced research publications, teaching, and in everyday communications amongst BCDSS members. Additional clarifications were added to section V, which outlines the discrimination complaints procedures, based on feedback from BCDSS members in the 2023 DEI Survey.

As a living document, it is continuously reviewed and refined by all BCDSS members as we strive to enhance our theoretical and practical understanding of discrimination and its structures.

The policy was originally written in English and later translated into German. It is now available in both languages on the BCDSS website to make it more accessible to BCDSS members and other German academic institutions working to counter discrimination. To refer to this policy document, please use the following reference:

BCDSS Antidiscrimination Policy, March 2024. The Bonn Centre for Slavery and Dependency Studies at the University of Bonn. [BCSS Antidiscriminationpolicy \(uni-bonn.de\)](https://www.uni-bonn.de/bcdss/antidiscriminationpolicy)

# I. Introduction

Respectful, trusting and non-discriminatory cooperation between all members and guests is a matter of course for the University of Bonn (Uni Bonn).<sup>1</sup> As part of Uni Bonn, the Bonn Center for Dependency and Slavery Studies (BCDSS) is committed to creating and maintaining a work, learning and research environment where all members feel safe, respected, heard, and protected from any conscious or unconscious acts of sexual harassment, discrimination or bullying (collectively referred to as 'discriminatory acts'). The BCDSS seeks to achieve this by raising awareness about discrimination and prejudicial behaviours among its members, training BCDSS members in diversity and equity knowledge and competencies, and by enforcing the protective measures outlined in this antidiscrimination policy to process violations.

The BCDSS welcomes students and researchers from all over the world. Internationality, as well as endorsing diversity in regard to language, gender, religion, age, health, social and cultural background as well as sexuality is one of our greatest assets and a promoter of excellent science. Naturally, the BCDSS is committed to promoting the principles of Diversity, Equity and Inclusion (DEI) building on the commitments of the Diversity Charter (*Charta der Vielfalt*)<sup>2</sup> which was ratified by Uni Bonn in 2017.

The objectives of this antidiscrimination policy document include clarifying the responsibilities of management and other BCDSS members in handling discriminatory complaints, defining the processes involved in dealing with various acts of sexual harassment, bullying, and discrimination, and highlighting Uni Bonn and BCDSS management's right to take appropriate measures in cases of violations. Furthermore, it describes standards of conduct and the various forms of support and procedural responses that are available to those affected by discrimination. These procedures include informal processes (such as being able to seek advice, counselling, or mediation) and formal procedures including the filing of formal complaints at Uni Bonn which may result in an investigation of allegations and disciplinary measures taken against violators based on the severity of the committed offense.

All BCDSS members and guests are obligated to comply with the policy and to adhere to its behavioural guidelines. In defining its scope, this antidiscrimination policy document applies to all BCDSS employees (in science and administration), trainees, and all students as well as professorial representatives and lecturers of the University of Bonn. It also applies to external persons, such as guests, fellows, and scholarship holders, as well as persons in application and appointment procedures, as long as they work in the area of responsibility of the University of Bonn.

This policy shall be published on the BCDSS website's 'Diversity Equity and Inclusion' page and made available in both German and English.

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<sup>1</sup> Amtliche Bekanntmachungen, 53. Jahrgang, Nr. 6: <https://hdl.handle.net/20.500.11811/10662>

English Version: [richtlinie zum schutz vor sexualisierter diskriminierung final en.pdf \(uni-bonn.de\)](https://www.charta-der-vielfalt.de/en/)

<sup>2</sup> <https://www.charta-der-vielfalt.de/en/>

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## II. Antidiscrimination Policies at BCDSS

### Forms of Discrimination & Harassment

We define discrimination at BCDSS as the unequal treatment of individuals, their subjection to acts of conscious or unconscious degradation, bias, violence, bullying, or explicit and implicit exclusion from work, learning opportunities, or decision-making and feedback processes based on an unjust distinction deriving from one or intersections among several (*multiple-discrimination*) of the following individual characteristics on age, ethnicity, nationality, race, gender & sexuality, religion or belief, physical and mental ability, and socioeconomic background, or any other relevant social categorisation that forms the basis for these discriminatory acts.

Ensuring the full inclusion of BCDSS members implies acknowledging their diverse characteristics, experiences and needs, and responding to them equitably in the BCDSS's work, learning, and research environments. In particular, ensuring inclusion and equitable treatment implies exerting effort to support groups that face additional challenges or higher statistical risks of exclusion. This is achieved by monitoring their current access and participation, identifying and removing barriers, and taking steps to actively support their access, participation, growth and achievement.<sup>3</sup>

The individual characteristics considered in this antidiscrimination policy draw on the listed 'Diversity Dimensions' that act as possible sources of discrimination, violence, and exclusion in the Diversity Charter 'Charta der Vielfalt' of 2006<sup>4</sup>. These Diversity Dimensions have been adjusted in this policy to reflect the needs of our academic context, and include adjustments like adding the category of 'race', and discussing gender and sexuality-based discrimination jointly as a single category due to the strong connections between these two forms of discrimination.

We define the respective discriminations linked to age, ethnicity, nationality, race, gender & sexuality, religion or belief, physical and mental ability, and socioeconomic background as follows:

#### Ageism

Acts of prejudice or discrimination against individuals because of their age. It includes conflicts over communication styles, values and attitudes when individuals belonging to different age groups interact, and also the systematic exclusion of individuals at the organizational level because of their age.

#### Ethnic or Nationality-based Discrimination

Acts of prejudice or discrimination towards individuals because they belong to a certain ethnicity or nationality. Prejudice and discrimination against people based on their ethnic or national identity can take several forms including:

- promoting stereotypes
- using offensive terminologies when referring to these groups in research, the classroom, or daily interactions at the BCDSS (even in a joking manner)

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<sup>3</sup> [A Guide for ensuring inclusion and equity in education - UNESCO Digital Library](#)

<sup>4</sup> [About the Diversity Charter - Für Diversity in der Arbeitswelt \(charta-der-vielfalt.de\)](#)

- the devaluation of their work or capabilities due to biased assumptions of their abilities stemming from perceptions of their ethnic or national identities
- their exclusion from social interactions
- their subjection to acts of violence or harm

Institutionally, discrimination can take place in the way that institutional policies and practices are designed to consciously or unconsciously privilege certain ethnic and national groups at the expense of other less privileged groups. At the BCDSS we recognise that countering these forms of ethnic and national discriminations goes beyond avoiding discriminatory language at the workplace and in research. It involves investigating and identifying various structural and systematic forms of discriminatory practices and actively correcting them.

## Racial Discrimination

Acts of prejudice or discrimination towards individuals based on the belief that racial differences among individuals are linked to inherent superiority or inferiority.

Prejudice and discrimination against people based on their racial identity can take several forms including:

- promoting stereotypes
- using offensive terminologies when referring to these groups in research, the classroom, or daily interactions at the BCDSS (even in a joking manner)
- the devaluation of their work or capabilities due to biased assumptions of their abilities stemming from perceptions of their racial identities
- their exclusion from social interactions
- their subjection to acts of violence or harm

Institutionally, discrimination can take place in the way that institutional policies and practices are designed to (consciously or unconsciously) consistently privilege certain racial groups at the expense of less privileged groups (systematic racism). At BCDSS we recognise that countering these forms of racial discriminations goes beyond avoiding discriminatory language at the workplace and in research. It involves investigating and identifying various structural and systematic forms of discriminatory practices and actively correcting them.

## Gender & Sexuality-Based Discrimination

At the BCDSS, gender and gender roles are understood as social and cultural constructions. All individuals have the freedom to choose the expression of their own gender identity which may or may not correspond to their sex assigned at birth - this includes respecting every individual's right to self-identification and use of chosen pronouns. We encourage all members and guests to be more conscious of implicit gender bias and normative oppressive expectations of gender performance, and to avoid subjecting the identity of others to preconceived notions of gender and relational expectations.

The BCDSS works to support women and/or members of the LGBTQIA+ community by promoting gender diversity at all levels of the Cluster. It also encourages them to make use of available peer to peer counselling support or mentoring opportunities provided by various support groups and entities at the University of Bonn.

No member or guest of the Cluster should feel disrespected, unsafe or excluded because of their sexuality and/or gender identity, and all kinds of gender-based discrimination including transphobia are not tolerated. The BCDSS also applies a zero-tolerance policy towards sexism, which involves acts of prejudice or discrimination exerted against individuals on the basis of their gender identity which are rooted in social structures, cultural contexts and assumptions of superiority.

We also acknowledge that understanding the additional challenges confronting individuals that belong to the LGBTQIA+ community (persons that are lesbian, gay, bisexual, transgender, non-binary, queer, intersex and asexual) is an important component in the promotion of diversity and equity at the Cluster, as these individuals are more likely to experience discrimination, prejudice, and violence based on their real or perceived sexuality.

## Religious Discrimination

The BCDSS is an academic institution that values the exchange of ideas and knowledge in respectful open debate. As such, the individual right to freedom of thought, conscience, religion or belief is regarded as a fundamental human right that is to be respected by all members during their interactions with each other. Acts of discrimination or prejudice, including the spreading of stereotypes, practicing social or institutional exclusion, or acts of violence towards individuals because of their actual or ascribed religion, belief or world views<sup>5</sup> are not tolerated at the BCDSS.

Respecting freedom of thought, conscience, religion or belief includes:

- Respecting an individual's privacy and right to keep their religion (religious identity) or belief private.
- Respecting the importance of spirituality, religion or belief of persons, and taking care to avoid ridiculing or insulting these during personal conversations or professional and classroom settings.
- Respecting religious or belief-based practices in lifestyle choices of persons which may among other aspects include forms of dress, prayer or dietary choices.
- During discussions or debates on religion or belief, opinions regarding them should be expressed and communicated in ways that are not humiliating, aggressive or intimidating to others. Extra care should be exerted in considering word choices to avoid the reproduction of harmful and offensive stereotypes associated with religion or belief in all teaching and working settings by all BCDSS members.

## Ableism

Ableism are conscious or unconscious social practices based on regarding the state of being able-bodied as 'normal' and discriminating in favour of 'able', non-disabled people. These discriminatory practices can result in the exclusion of people living with disabilities or chronic illnesses, the devaluation of their contributions, the reduction of their opportunities for growth and development, and the creation of public spaces, services or opportunities that benefit able persons only.

At the BCDSS, we believe it is important to better understand the needs of persons with chronic physical and/or mental illness. We exert efforts to accommodate them and ensure they are fully capable of accessing and participating in BCDSS research, work and study opportunities, and that they are able to receive the support they need to do so from the BCDSS or relevant entities at Uni Bonn.

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<sup>5</sup> Within the limits of German law.

Here access and participation refer not only to physical access (such as the availability of ramps or lifts suitable for wheelchair use), but in the wider sense to include overall health, emotional and mental capabilities that can also hinder participation (such as suffering from anxiety).

## Discrimination Based on Socioeconomic Status

The socioeconomic background of individuals can have a strong impact on their educational and work opportunities, and their access to resources.<sup>6</sup> Classism (or discrimination based on socioeconomic status) in academia has long been established as a factor that results in discriminatory behavior or exclusion of individuals from working or low-income household backgrounds, and also of social research on less advantaged groups of people being dominated by the perspectives of academics coming from privileged backgrounds.

To improve access and create more diversity in academic perspectives, the BCDSS works to provide greater access to individuals from less advantaged socioeconomic groups through the provision of financial support, work opportunities, and remote education opportunities. It also seeks to provide capacity-building workshops and mentorship opportunities to all members to bridge any capability and information gaps that are based on socioeconomic differences.

## Sexual Harassment

Working to eliminate sexual harassment or sexual violence at BCDSS, and offering timely and adequate protection and support to victims is a key factor in achieving gender justice. In defining '**Sexual Harassment**' and all behaviors that fall under this term, we follow Universität Bonn's 'Guidelines for Protection against Sexualized Discrimination and Violence' of February 15, 2023. The following passage is based on Section 2: Definitions (§ 2 Begriffsbestimmungen) of the Guideline:<sup>7</sup>

(1) Sexualized discrimination and violence within the context of these policies are behaviors/acts causing sexual harassment, degradation, or discrimination on the basis of gender/gender identity or sexual orientation. Such behaviors include illegal acts and minor offences perceived as demeaning by the affected parties. Sexual harassment in accordance with the German General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz, AGG) is verbal or non-verbal behavior of a sexualized nature or intent which is aimed at or results in the violation of the dignity of the affected person. In particular, such violation occurs when an environment characterized by intimidation, hostility, humiliation, degradation, and/or insults is created.

(2) Sexualized discrimination and violence occur in many forms. In particular, these include:

- Derogatory expressions of a sexual nature and verbal sexual harassment through inappropriate, sexualized comments (lewd jokes, remarks about appearance, unwanted use of terms of endearment)
- Inappropriate questions concerning the private or intimate lives of individuals
- Acts of harassment, such as staring or whistling
- Inappropriate physical closeness or unwanted touching, even if seemingly accidental

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<sup>6</sup> [Social background - Für Diversity in der Arbeitswelt \(charta-der-vielfalt.de\)](https://www.charta-der-vielfalt.de)

<sup>7</sup> Access to the full guidelines (in German): [Amtliche Bekanntmachungen, 53. Jahrgang, Nr. 6 \(uni-bonn.de\)](#)  
(English Version): [richtlinie zum schutz vor sexualisierter diskriminierung final\\_en.pdf \(uni-bonn.de\)](#)



- Solicitation of sexual acts
- Stalking, including cyber-stalking
- Using sexually degrading content on University devices, including copying it and using corresponding applications
- Dissemination/distribution of texts or images of a sexist nature (posters, calendars, screensavers, email attachments, graffiti, etc.)
- Sexualized initiation/first-year/hazing rituals at the University (such as being pressured to undress in public)
- Promoting events through the use of content of a sexist nature
- Making images or videos of intimate body areas without consent, including 'upskirting' (images/video taken under someone's clothing) or 'downblousing' (images/video taken down someone's clothing) without consent, as well as the distribution of such content
- Sexual harassment in the form of unwanted physical touching of sexual nature or intent, including, for example, forced kissing and touching of intimate body areas
- Distribution of pornographic content that is illegal under criminal law
- Sexual assault, molestation, and rape

An act may also be deemed sexual in nature based on the circumstances of a particular case.

3) Sexualized discrimination and violence often take place within the context of hierarchies or the exercise of power, whether on or off campus. Cases of sexualized discrimination and violence are seen as particularly grave where advisor/student or superior/subordinate relationships are exploited in situations of employment, study, or training; or where promises are made of personal or career opportunities or threats of disadvantages.

## Bullying, Verbal Assault & Defamation

Bullying is repeated aggressive, intimidating or coercive behavior exerted by one or more individuals towards one or more individuals over a period of time. It can include harmful behaviors such as physical or verbal assault, the systematic spreading of rumours with the purpose of defamation, insulting behaviors, or any form of humiliating treatment.

Cyberbullying is a form of bullying that takes place virtually through various forms of online communication media, emails, social media outlets, forums, websites, chats or audio/video conferences, with the purpose of exerting harm, defamation, exerting threats, harassment, coercion or exposure of victims.

The BCDSS adopts a zero-tolerance approach towards bullying, cyberbullying, verbal assault and defamation and encourages victims to immediately report these discriminatory acts, or any other sexual harassment or discriminatory acts through the correct channels that are outlined in Section IV of this guideline.

### III. Measures Supporting Equity & Inclusion:

The BCDSS works to create a diverse, work, learning, and research environment where all members can feel safe, respected, and heard. Its efforts in this regard are guided through the implementation of a Diversity, Equity, and Inclusion (DEI) framework which also facilitates access to antidiscrimination and equity support, while also decentralizing DEI policy-making and the overall participation or inclusion of BCDSS members in DEI areas.

In this framework, **'equity'** implies acknowledging these diverse characteristics, experiences, and needs and responding to them equitably in work, learning, and research environments by exerting effort to support groups that face additional challenges or higher statistical risks of exclusion and taking steps to actively support their access, participation, growth, and achievement at the BCDSS. Replacing 'equal opportunities' with 'equity' reflects the BCDSS's commitment to achieving fairness in outcomes.

The term **'inclusion'** refers to creating a welcoming environment where the diversity of BCDSS members, their backgrounds, perspectives, and experiences are respected and valued and where all members are encouraged to participate, voice concerns, provide feedback, and report discrimination. Adding 'inclusion' to diversity and equity; indicates that the BCDSS is not just committed to achieving representative diversity, but also to ensuring that diverse members within the BCDSS are accepted and able to participate fully in all our processes and opportunities. A sense of **'belonging'** among our members is the outcome of effective DEI practices that we hope to achieve. It occurs when all members have a sense of fitting in or feeling like they are important members of the BCDSS.

The following sections outline some of BCDSS's policies to counter discrimination by enhancing inclusion and equity at the cluster:

#### Language

The BCDSS is also conscious of the role that language plays in promoting diversity, equity and inclusion in the context of produced research publications, teaching, and in everyday communications amongst BCDSS members. The Center understands language to be intimately connected to power structures and strives to foster an awareness of epistemic dependencies resulting from linguistic dependencies.

In its publication series, the Bonn Center for Dependency and Slavery Studies (BCDSS) works against forms of gatekeeping which may put obstacles in the way of scholarly work in English felt by some to be non-standard. Given that language is multiply situated and constantly evolving, the editors of Dependency and Slavery Studies do not insist on conformity to the traditional binary standard Englishes (British and American). Our focus is on clarity and the communicative value of English as an international lingua franca. Authors are encouraged to write in their national or regional variety of English.

BCDSS members are also encouraged to carefully reflect on the language and terminology they use in daily interactions with each other or in teaching settings. For example, when referring to people affected by a particular disability or chronic illness, we avoid using the phrases 'suffers from' or 'is a victim of' or 'crippled' etc. When unsure, to avoid offensive language it is recommended to ask persons of their own labelling preferences.

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## Accessibility and Safety on BCDSS Premises

The BCDSS is committed towards the principles of diversity, equity, inclusion and member safety when designing or creating future spatial and technical conditions within its premises. Our objective is to enable the greatest degree of participation for all members possible, to provide accessibility support for all persons who need it, and to remove any areas of fear or danger.

The BCDSS is also committed to communicating information on the accessibility and safety of its premises, events and learning opportunities widely to all of its members.

## Recruitment & Selection Policies:

The BCDSS acknowledges that the diversity of its members across organizational levels is key to its ongoing success and productivity. It is, therefore committed to creating and enforcing unbiased recruitment and application processes for staff and students alike. Our overall objective is to create a diverse and inclusive learning and working environment at the BCDSS that eliminates all forms of discrimination in:

- Student and staff selection processes related to employment, promotion, training or any other development opportunities
- Pay and benefits
- Conditions of employment
- Dismissal and redundancy
- Parental leave requests
- Flexible working hours requests

In practice this implies:

- Considering diversity dimensions in recruitment and student application processes including: the writing of calls/job descriptions, advertising, processing and short-listing applications. This implies adapting job or student profiles to the respective skills required to promote diversity and making sure adverts are posted on accessible platforms.
- Having a diverse recruitment/selection board
- Training persons involved in recruitment/selection processes in unconscious bias and appropriate interview questions.
- Involving the Diversity, Equity and Inclusion (DEI) Coordinator at all stages of recruitment.

## Monitoring and Evaluation

The Diversity, Equity and Inclusion (DEI) Coordinator at the BCDSS will take the lead in drafting and implementing an annual online 'Diversity, Equity and Inclusion BCDSS Survey' (anonymous). Survey findings, together with feedback provided by BCDSS members throughout the year, will be included in an annual 'Diversity, Equity and Inclusion BCDSS Report', and inform revisions to the content and procedures outlined in this Antidiscrimination Policy document.

The 'Diversity and Equality BCDSS Report' and suggested revisions to this Antidiscrimination Guideline will be presented by the Diversity, Equity and Inclusion (DEI) Coordinator at the BCDSS Steering Committee meetings for approvals each year.

## IV. BCDSS Diversity, Equity and Inclusion (DEI) Structures

At the BCDSS, working towards countering discrimination and implementing DEI principles and strategies is a collective effort involving all BCDSS members. The following DEI Structures and Representatives take the lead in coordinating and implementing these efforts:

1. **Diversity, Equity and Inclusion (DEI) Coordinator:** Is responsible for developing and implementing DEI concepts, strategies and policies at the BCDSS. Main responsibilities and functions of the DEI Coordinator include:
  - Developing and improving Antidiscrimination policies and procedures at the BCDSS
  - Developing and implementing the Cluster’s Diversity Certificates (I and II)
  - Conducting the monitoring and evaluating of DEI at the BCDSS
  - Drafting the BCDSS’s DEI Strategy document
  - Handling communications related to DEI and planning and implementing DEI events at the BCDSS
  - The DEI Coordinator must be invited to all BCDSS selection committees and approve all decisions taken by written, signed confirmation with the aim of identifying discrimination and promoting DEI. When the DEI Coordinator is unable to attend, the Equal Opportunity Representative may be asked to attend instead.
2. **The Equal Opportunity Representative(s):** Elected for a period of three years by all BCDSS members at the General Assembly meeting, the Equal Opportunity Representative is a permanent member of the BCDSS Steering Committee (the main decision-making body of the BCDSS). Main responsibilities and functions of the Equal Opportunity Representative include:
  - Using their right to vote at the Steering Committee to represent the interests of BCDSS members regarding equal opportunities.
  - Receiving suggestions regarding the promotion of equal opportunities from all BCDSS members and sharing these with the DEI Coordinator so they can be incorporated in DEI strategies.
  - Receiving discrimination complaints from all BCDSS members.
3. **DEI Working Group:** A voluntary advisory group that is open to all BCDSS members. Group meetings are coordinated by the DEI Coordinator.<sup>8</sup> Some of the main functions of this working group include:
  - Reviewing and commenting on DEI policies and strategies that are put forward by the DEI Coordinator.
  - Coordinating DEI internal and external events, lectures and readings.
4. **Anti-Discrimination Team:** A voluntary group of BCDSS members that agree to be first points of contact for BCDSS members who are experiencing any of the forms of discrimination outlined in this document.<sup>9</sup> Antidiscrimination Team members are not involved in handling formal complaints related to discrimination or sexual harassment. Formal complaints are processed through the Legal Office (Dezernat 1 “Justizariat”) at Uni Bonn. The details of this process are provided below in Section V of the BCDSS Antidiscrimination Policy. The Diversity, Equity and Inclusion (DEI) Coordinator and the Equal Opportunity Representative are also members of the Antidiscrimination Team. Some of their main functions include:

<sup>8</sup> BCDSS members who wish to join the DEI Working Group can inform the DEI Coordinator via email.

<sup>9</sup> BCDSS members who wish to join the Antidiscrimination Team can inform the DEI Coordinator via email.

- Listening to colleagues' complaints confidentially and providing guidance on possible avenues for action and support provided by the BCDSS and Uni Bonn.
- Attend trainings organized by the BCDSS on the topic of discrimination and handling discrimination complaints.

## V. Getting Support & Acting Against Discrimination

The BCDSS applies a zero-tolerance policy towards acts of sexual harassment or violence, bullying, discrimination, or any kind of inappropriate behavior whether work-related or personal. We encourage all Cluster members to refrain from committing any acts of discrimination and to recognize and challenge any form of discrimination or violence by utilising the complaints and counselling mechanisms that are available internally at the Cluster, or at the University of Bonn.<sup>10</sup> In cases of emergency situations or threats to safety, the Uni Bonn Campus Security can be called directly.<sup>11</sup>

When seeking initial support against discrimination or harassment, BCDSS members can reach out to the Diversity, Equity and Inclusion Coordinator, Equal Opportunity Representative (s), or any of the Anti-Discrimination Team members who are all listed in the BCDSS DEI webpage<sup>12</sup>. All of these persons can listen to complaints and advise confidentially on possible forms of action depending on the situation. The confidentiality of individuals seeking support from these listed individuals will be respected when making anonymous complaints. BCDSS members are free to express their concerns and make complaints about others confidentially and anonymously, their concerns will be treated seriously and in a timely manner. Only in situations when there is genuine concern that the complaining person is in immediate danger to themselves, or they are endangering other dependent persons (such as children), will confidentiality be broken and the appropriate authorities informed at Uni Bonn.

Resolving discrimination complaints against another person while maintaining anonymity can only be done **informally** and through mediation. Mediation is carried out by the DEI Coordinator at the BCDSS and not by members of the Antidiscrimination Team. After obtaining consent from the complaining person(s), the mediator (DEI Coordinator) will speak confidentially with the person(s) accused of the discriminatory behaviour. The person making the complaint can also be part of the mediation discussion if they wish, or they can choose to remain anonymous. The objective of mediation is to halt discriminatory/harassing behaviors quickly and confidentially. It relies primarily on raising awareness and sensitising individuals to discriminatory/harassing behaviours so they can be stopped.

Persons affected by discrimination, sexual harassment or bullying can also make a **formal complaint** against a BCDSS member that can result in actions taken against that member depending on the severity of the offense. Formal complaints procedures<sup>13</sup> are initiated inside the Cluster by informing the DEI Coordinator at the BCDSS. The DEI Coordinator will make a record of the complaint that will be reviewed and signed by the person(s) filing the complaint. The DEI Coordinator will then

<sup>10</sup> Please visit the 'Emergency Contacts' page on the BCDSS website for Anti-discrimination counselling and support contacts at Uni Bonn (weblink).

<sup>11</sup> [Emergency Numbers — University of Bonn \(uni-bonn.de\)](https://www.uni-bonn.de/emergency-numbers)

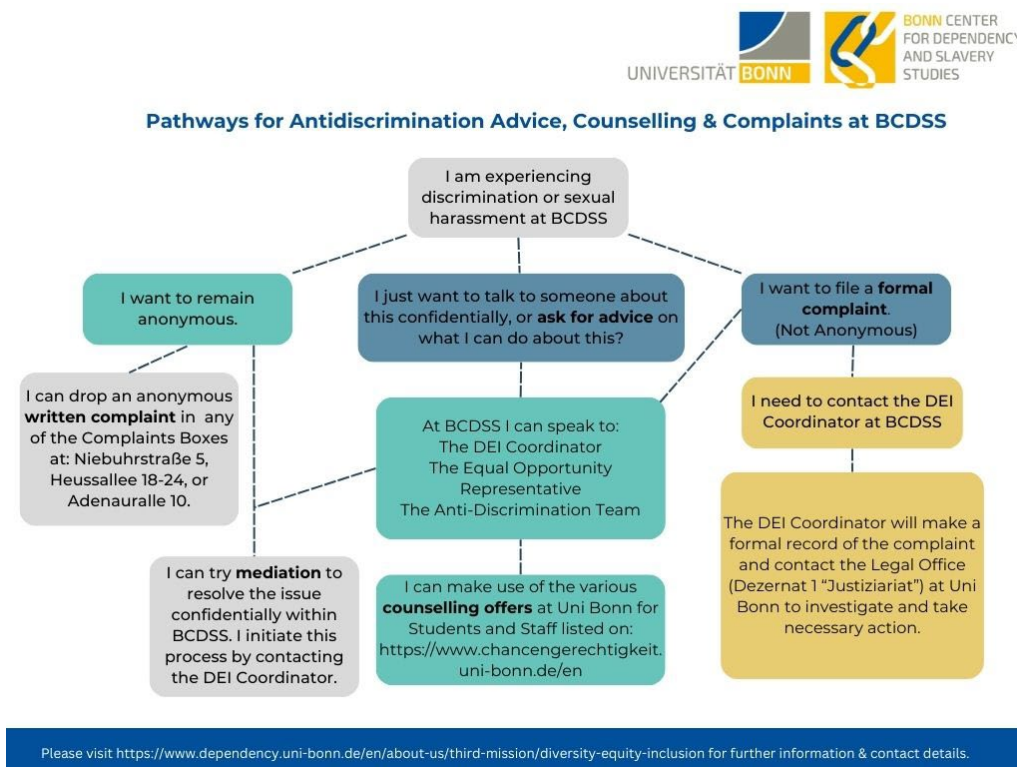
<sup>12</sup> [DEI Team — BCDSS \(uni-bonn.de\)](https://www.uni-bonn.de/bcdss/dei-team)

<sup>13</sup> For all types of discriminatory complains (sexual harassment, discrimination and bullying) formal complaints follow those defined in § 6 (Beschwerde und zuständige Stelle) of Universität Bonn's 'Guidelines for Protection against Sexualized Discrimination and Violence' of February 15, 2023. The English version of Section 6 is also available in Annex I of this document.

inform the Cluster Speaker and BCDSS Managing Director in order to contact the Legal Office (Dezernat 1 “Justizariat”) at Uni Bonn. The Legal Office will then investigate the complaint and take necessary actions according to the investigation outcomes and the severity of the violations. Thus, formal complaints cannot be made anonymously, as claims against other persons will be investigated by the Legal Office at Uni Bonn.

Provided that the persons affected agree, all persons at the Cluster with teaching, supervisory, training and leadership duties are obligated to immediately inform the DEI Coordinator or one of the offices specified in § 5(4) or § 6(3) of Universität Bonn’s ‘Guidelines for Protection against Sexualized Discrimination and Violence’ of February 15, 2023<sup>14</sup>) in the event of a suspicion of sexual discrimination and violence. If sexual harassment within the meaning of this guideline is established, the University of Bonn undertakes to take measures (cf. § 8). In acute emergencies affected persons can contact Campus Security directly by telephone on (+49 228 73-7444).<sup>15</sup>

The following diagram depicts the various pathways for receiving informal and formal support when experiencing discrimination at BCDSS:



The contact information of the DEI Coordinator, Equal Opportunity Representative(s) and Anti-discrimination Team can be found on the DEI Team page of the BCDSS website.

If you are unsure of who to contact, how to proceed or require support in contacting any of the Uni Bonn contact points listed in this diagram, kindly reach out to Dima Al Munajed, DEI Coordinator at BCDSS (Email: [dmunajed@uni-bonn.de](mailto:dmunajed@uni-bonn.de), Office 3.009, 3<sup>rd</sup> Floor, Niebuhrstraße 5).

<sup>14</sup> Access to the full guidelines (in German): [Amtliche Bekanntmachungen, 53. Jahrgang, Nr. 6 \(uni-bonn.de\)](#)

<sup>15</sup> [Emergency numbers — Universität Bonn \(uni-bonn.de\)](#)



# Annex I: Formal Antidiscrimination Complaints Procedures

Section 6 Responsible office for complaints (§ 6 Beschwerde und zuständige Stelle) of Universität Bonn's 'Guidelines for Protection against Sexualized Discrimination and Violence' of February 15, 2023:<sup>16</sup>

- (1) It is not necessary for any individual affected by sexualized discrimination and violence to take the informal procedural route as per Section 5 first before filing a complaint (formal procedure) in response to a relevant incident. Disciplinary proceedings against an accused student enrolled at the University of Bonn are governed by the regulations adopted in accordance with Section 51a of the Higher Education Act of North Rhine-Westphalia (Gesetz über die Hochschulen des Landes Nordrhein-Westfalen, HG NRW). In such cases, the office specified in paragraph 3 informs the office responsible for initiating such proceedings pursuant to those regulations.
- (2) The objective of the complaints process is to inform the University of Bonn of a particular matter, the circumstances of which are to be clarified and addressed.
- (3) Filing a complaint involves reporting the relevant facts to the Administrative Office for Anti-Discrimination Matters (the complaints desk in accordance with the General Act on Equal Treatment). Complaints are filed in writing or in the form of records of verbal statements. The affected individual must sign the record of the verbal statement, which must outline in precise detail the incident(s) perceived as harassment or discrimination. Any witness testimony and/or available evidence, such as emails or messages via a messenger service, should be documented as well.
- (4) When a complaint is received, the office specified under the first sentence of paragraph 3 holds a consultation meeting with the affected individual to inform the latter of the subsequent procedure and to ask the individual questions regarding the incident(s). The fundamental content discussed in the consultation meeting is documented in the form of a written protocol.
- (5) The office specified under paragraph 3 informs an accused individual of allegations made against him or her. The accused individual is given the opportunity to respond to the allegations in writing and may be questioned regarding the alleged incident in a meeting with the office stated in paragraph 3. Accused individuals are notified in advance of their right to contact their relevant representative body and to obtain external support.
- (6) Upon reviewing and evaluating the incident(s) concerned and hearing all testimony and statements, the office stated in paragraph 3 informs the manager or HR department of the accused individual of the finding(s) made and issues recommendations for any measures to be taken. The manager or HR department then decides which measures (Section 8), if any, are to be taken against the accused individual to prevent repeat offences and to protect those affected, involving the relevant administrative areas and the responsible manager from the areas of work or study concerned as necessary. Affected individuals can neither demand that the University of Bonn take any measures nor prevent such measures from being taken. In exceptional cases, the manager of the accused individual may, upon being informed by the office stated in paragraph 3, take immediate measures before reading any response statement by the accused.
- (7) Once the relevant facts in the matter have been definitively clarified, the affected individual and the accused individual are both promptly informed of the findings of the review as well as of any measures that have been taken.

<sup>16</sup> Access to the full English version of Uni Bonn's 'Policies for Protection against Sexualized Discrimination and Violence' document is available on: [richtlinie\\_zum\\_schutz\\_vor\\_sexualisierter\\_diskriminierung\\_final\\_en.pdf \(uni-bonn.de\)](https://www.uni-bonn.de/richtlinie-zum-schutz-vor-sexualisierter-diskriminierung-final-en.pdf)