



# Code of Conduct



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Code of good conduct to prevent and combat harassment at work

*The Champalimaud Foundation has a set of values on which it was built and which underlie its day-to-day operations.*

The entire community that makes up the Foundation, in its most diverse forms of collaboration, knows and practises them. Although made up of very diverse people, the objectives they want to achieve by pursuing these values are shared by all.

Our Code of Conduct gives expression to these shared values and the way in which we intend, together and in diversity, to put them into practice, regardless of the position each person occupies within the Foundation. It bears in mind our mission, the values and principles of the Foundation, remembering the need to adapt individual and collective performance to these values.

Therefore, the existence of a Code of Conduct is very important to us, since it is fundamental for an institution such as the Champalimaud Foundation to express the values and principles that guide it and to show, both internally and externally, the way in which it understands them and puts them into practice. All these values have existed for as long as we have existed, but condensing them into a text, to be read and understood by all members of the CF community and where the Foundation's vision regarding its practice can be understood, is a huge step towards its consolidation.

The development of a Code of Conduct at the Champalimaud Foundation takes on even more significance given the complexity of its translational vocation.

This Code of Conduct therefore intends to unite, and not separate, the two areas that are the essence of the Foundation, distinct but complementary: the clinical area and the research area.

Covering both areas, and all Foundation employees, the Code establishes, in its first part, the set of values and principles common to the institution that they support, regardless of the area of activity and that are applicable to all equally. However, by recognising the specificities of performance in the clinical and research areas, the particular rules inherent to each one are identified in each subsequent chapter, whenever applicable.

The Code of Conduct is not intended to be exhaustive or replace the applicable standards that are in force, but rather to provide a set of general guidelines to be completed and put into practice, integrated into the Foundation's entire system of standards and policies and always taking into account compliance with applicable legal standards.

Therefore, and taking into account the continuous process attached to the Code of Conduct, there is also the Code of Good Conduct for preventing and combating harassment at work, which reinforces the already-published provisions relating to equity, diversity and non-discrimination.

We count on your contributions and constructive vision.



## A. Mission

*CF's core mission is to bring the benefits of biomedical science to those who need them most.*

*To create and develop, with independence, rigour, dedication, and creativity, and in conformity with the highest ethical and scientific standards, an environment for the development of advanced biomedical research programmes and for supplying translational, interdisciplinary clinical care. This is designed to result in pioneering healthcare discoveries with a direct impact on quality of life. Through its activities, the Foundation aims to be a worldwide leader in scientific and technological innovation, with the ultimate purpose of preventing, diagnosing, and treating disease. This work is guided by an attitude of embracing challenges and increasing society's awareness of human health problems.*

The characteristics of a complex organisation such as the CF derive from both the human and professional qualities of its individual members, but also from the properties that emerge from the structure and dynamics of their interactions. These are based both on individual qualities that are shared by all (common values, principles, and attitudes), as well as on those that derive from the individual differences, from a rich diversity that provides the basis for productive cooperation.

The core principle of this Code of Conduct is therefore what unites us as human beings: our dignity.

Beyond that, in an organisation where everyday people from multiple cultures and nationalities work and interact, our Code of Conduct gives expression to our common values and how we aim to, together and in our rich diversity, enact them to produce outstanding work in the best environment and, in so doing, to fully achieve our mission.

**Respect:** to uphold a culture that treats all with dignity, fairness, and respect;

**Integrity:** to act with integrity, professionalism and respect for this Code of Conduct and the law;

**Ethics and Good Practices:** to maintain the highest ethical standards and to follow the best practices in all aspects of activity;

**Excellence and Innovation:** to achieve the highest standards of performance while supporting and demonstrating new ideas with a positive impact on our lives;

**Equity, Diversity and Non-discrimination:** to foster a true culture of excellence with diversity and inclusion, in a safe and equitable environment;

**Gender Balance:** to strengthen gender balance, both in personnel and in the focus of our research and clinical activity, essential to our environment and the quality of our results;

**Transparency and Accountability:** to maintain a culture of transparency and accountability at all levels within CF;

**Responsibility:** to act with shared responsibility towards others and the environment, envisaging the creation of a safe and productive workplace.

## B. Scope

The Code of Conduct (CC) shall apply to everyone within the CF's activity, including Healthcare and Research professionals, Students, and all community members regardless of their contractual connection to the institution.

For the purpose of this Code, the reference to CF community members regards all of those who, directly or indirectly, work at the CF, or are part of its teams, permanently or temporarily, in any capacity and regardless of the nature of their relation to CF.

The Code applies wherever members of the community are doing CF-related work, outside or within the Foundation's multiple facilities.

## C. Values and General Principles

### C.1. Values

#### 1. Respect

*CF is committed to a culture that treats all with dignity, fairness, and respect.*

All CF community members, in general, as well as in the exercise of their powers, shall act towards patients, research participants, colleagues, staff, the workspace, society, and the environment in a respectful, fair, and careful manner, and in accordance with the applicable legal and ethical provisions.

#### 2. Integrity

*CF community members must act with integrity, professionalism, and respect for this Code of Conduct and the law.*

CF community members are expected to demonstrate the highest standards of integrity and act in good faith, with intellectual honesty and fairness, professionalism, and respect this CC and the law in all matters affecting their duties and the interests of CF.

#### 3. Ethics and Good Practices

*CF always strives to maintain the highest ethical standards and to follow the best practices in all aspects of its activity.*

**3.1.** CF community members commit to always acting in good faith, with the best clinical and research practices, in agreement with the applicable ethical standards, whether internal, national, or international and with all governing law.

**3.2.** Everyone from all functional areas and professional categories is expected to perform their role with the greatest rigour, dedication, and professionalism, seeking to apply all the best available knowledge and techniques to meet the needs and expectations of patients and participants in all CF activity.

#### 4. Excellence and Innovation

*To achieve the highest standards of performance while supporting and demonstrating new ideas with a positive impact on our lives.*

CF is committed to always achieving the highest standards of performance, investing in scientific and technological innovation, with the ultimate purpose of preventing, diagnosing, and treating disease, while supporting new ideas and creativity with a positive impact on our lives.

#### 5. Equity, Diversity and Non-Discrimination

*A true culture of excellence is brought about with diversity and inclusion, in a safe and equitable environment.*

**5.1.** CF community members are expected to always foster and respect a culture of excellence and diversity, promoting equity and inclusion, regardless of socioeconomic status, race, ethnicity, language, nationality, sex, gender, sexual orientation, religion, abilities, age, and life experience, and must actively prevent harassment of any kind.

**5.2.** Any conduct that has the purpose or effect of unreasonably interfering with an individual's work performance, namely creating an intimidating, hostile, humiliating, or sexually offensive work environment, will be treated as discriminatory and unlawful.

#### 6. Gender Balance

*Attention to gender balance in our activity is essential to both our work environment and the quality of our results.*

**6.1.** Equal opportunity in recruitment and at the subsequent career stages, based on quality and competence criteria, is essential for a balanced, healthy, equitable work environment.

**6.2.** In the same way, the quality of results both in clinical and fundamental research is based on a gender equality policy.

**6.3.** For this purpose, a *Gender Equality Plan* is in place at CF which includes the development of these policies.

## **7. Transparency and Accountability**

*A culture of transparency and accountability is to be fostered at all levels within CF.*

**7.1.** CF community members shall communicate in a transparent, honest, fair, and open way. All members should hold themselves and each other to high standards of performance and personal integrity.

**7.2.** There should be clear lines of accountability for all decisions made.

## **8. Responsibility**

*A shared responsibility towards others, the environment and towards creating a safe productive environment is at the heart of the CF community.*

**8.1.** CF community members must act responsibly with patients, research participants, colleagues, staff, visitors, the local community, and society in general. We should be equally responsible towards ecosystems and the environment.

**8.2.** CF community members are expected to behave with respect and an open mind towards others for the creation of a positive working environment sensitive to different experiences and views.

**8.3.** It is a responsibility of all CF community members to foster a psychologically safe environment. In particular, directors, principal investigators, group leaders and other managers, should act as a role model towards creating a safe and productive atmosphere.

**8.4.** The highest level of ethical standards and social responsibility in professional conduct must be followed.

## **C.2. General Principles**

### **9. Honest Communication and Respectful Environment in the Workplace**

**9.1.** Everyone at CF, including all CF members, patients, third parties or the public in general must be treated fairly with dignity, respect, kindness and courtesy, at all times.

**9.2.** It is encouraged to foster a workplace where CF community members are free to discuss any concerns they may have in a transparent and professional manner.

**9.3.** CF community members are always responsible for respecting the rights of those they interact with.

### **10. Confidentiality and Use of Information**

**10.1.** Any information regarding a patient's identity, condition, care, and any other personal and health data is absolutely confidential. It must be used with the utmost discretion when accessed and communicated in the performance of professional duties.

**10.2.** The same principles of confidentiality and discretion apply to information concerning research participants as well as scientific and corporate records, with the necessary adaptations.

**10.3.** Confidentiality is necessary whenever information related to CF activity is confidential, as a result of its scientific, clinical or corporate nature; as determined by supervising staff; or being considered confidential by the Board.

This duty must be maintained even after having left CF.

**10.4.** CF community members must prepare and maintain all records in timely fashion, accurately, and with the necessary detail. In the same way, computer passwords and any protected data access, must always be protected from disclosure.

## 11. Privacy and Data Protection

- 11.1.** CF is committed to the protection of data related to its activity within the limits of the applicable law.
- 11.2.** Members who work with personal data, or who have access to such data, must respect the privacy and integrity of the owner, in accordance with the provisions of the applicable law. This protection also applies to any suppliers, consultants, contractors, or any other party that has any type of relationship with CF.
- 11.3.** The collection of personal data must take place only to the extent that is strictly necessary, and for specific, explicit, and legitimate goals, and cannot be processed in a manner incompatible with such objectives.
- 11.4.** CF community members may not use personal data to which they have access to in the context of their duties for unethical or illicit purposes nor transfer that data to unauthorised persons or organisations, either internally or externally.
- 11.5.** When a breach of confidentiality occurs, members who have caused the incident or have been aware that it has occurred or may occur, must immediately report it to their supervisor.

For this purpose, a *Data Protection and Privacy Policy* is in place at CF.

## 12. Environmental Protection

- 12.1.** Within the scope of the CF environmental policy, members must adopt the best practices of environmental protection, specifically promoting eco-efficient management, to minimise the environmental impact of their activities, in a responsible use of CF resources.
- 12.2.** CF recognises that it has a role to play in the fight against climate change. For that purpose, CF commits to limiting the environmental footprint of its products and activities throughout the value chain, namely by saving water and

energy, reducing emissions and waste, and minimising its carbon-footprint.

## 13. Safety

The Health and Quality of Life of all those at CF, those we interact with, and specifically collaborator's safety, is a priority for our community.

This involves raising awareness, health and safety policies, occupational health, and monitoring, and includes assessing, preventing, and controlling biological, chemical, and physical hazards, thus avoiding injuries inherent to our activities.

For this purpose, an Occupational Health Office, a Health and Safety Unit and a Hospital Infection Control Committee are in place at CF.

## 14. Protection of CF Image

It is expected that all CF community members use communications in a responsible way and consider the consequences of such uses.

## 15. Intellectual Property

- 15.1.** CF is committed to protecting intellectual property rights, whether its own rights or those of third parties.
- 15.2.** CF community members must act with integrity and honesty, regarding competitive information.
- 15.3.** CF community members must not, under any circumstance, misuse privileged information, or resources to which they have access, in the performance of their duties.
- They shall equally not proceed to the unlawful acquisition, use and disclosure of trade secrets, or any other kind of secrets protected by law.



## 16. Authorship and Publications

- 16.1.** The author of any publication developed within CF shall be aware of and comply with the provisions established in the *CF Publishing Policy*, in place at CF.
- 16.2.** The principal investigator or project coordinator is responsible for ensuring that authorship is attributed equitably and based on meeting all criteria of this Policy.
- 16.3.** All authors are fully responsible for the content of a publication, unless otherwise specified.
- 16.4.** Efforts should be made by the authors to make published work accessible to the widest possible interested audience, namely through the adoption of the principles of “Open Science”.

For this purpose, an *Open Access Policy* is in place at CF.

## 17. Relations between Members of CF Community

- 17.1.** CF community members must respect, in the course of their duties, the principle of trustworthiness, which implies the performance of their professional duties, the compliance with supervisor instructions, the respect for the appropriate supervising channels, and an attitude of transparency and openness towards others.
- 17.2.** No position may be used to exert an attitude of power, influence, or persuasion in order to condition or favour relationships or conducts within the CF community.
- 17.3.** The concealment or holding back from their supervisors and colleagues of any relevant information or action necessary for the work to be pursued, is against the reliability and good work practices expected from CF community members, particularly if pursuing personal advantage. The supply of false, inaccurate, or overstated information, the refusal to collaborate with colleagues, and any obstructive bearing is equally against the good work practices to be abided by.

- 17.4.** Members who perform management, coordination or leadership duties must provide clear and understandable instructions to their supervisees.

## 18. Relations with Third Parties (including with other institutions)

Formal or informal contacts with any third parties should always reflect CF’s guidance and positions. All members should carry out these relationships with quality, integrity, courtesy, and transparency.

## 19. Conflicts of Interest

- 19.1.** A conflict of interest exists whenever members have an interest in a matter that may influence, or appear to influence, the impartial performance of their duties. CF community members are committed to ensuring the exercise of their duties with no conflicts of interest.
- 19.2.** In connection with any actual or potential conflict of interest, an interested person must disclose the existence of the financial or personal interest and be given the opportunity to disclose all material facts.
- 19.3.** CF commits to proactively identifying and to managing any situation of potential conflict of interest and will put in place measures intended to ensure the impartial performance of the duties of the interested person.
- 19.4.** CF community members are bound to declare the existence of incompatibilities under the terms of the procedures and conditions established in the applicable law.

## 20. Prevention of Fraud and Corruption

- 20.1.** CF has a policy of zero tolerance for acts of fraud and corruption that may jeopardise the name of the Institution, meaning that all such incidents are to be reported and will be investigated in accordance with institutional policies and the applicable legal framework, with the corresponding consequences.

- 20.2.** The fraud and corruption prevention policy applies, without exception, to all activities and operations of CF, including any irregularity, or even suspicion of irregularity, involving staff members, as well as suppliers, consultants, or any other party that has any type of relationship with CF.
- 20.3.** CF community members must not participate in any form of bribery or corruption, including offering, promising, giving, accepting, or soliciting payments or other benefits, tangible or not, in any form and of any value, to gain any improper profit or advantage, influence or oblige any decision, directly or for third parties, while dealing with any process, supplier, consultant or other individuals or external entities of any kind.
- 20.4.** Any dishonest or fraudulent act, misappropriation of funds or other asset or supplies, dishonest handling or reporting of financial transactions, purchases or expenses, speculation based on knowledge of privileged information concerning CF activities, passing on of CF confidential data, intentional destruction, elimination or inappropriate use of records, accessories, equipment, amounts, grants or any other information belonging to CF, and/ or any related or similar irregularity with the intention of deceiving CF, those related to it, or others, will be investigated in accordance with institutional policies and the applicable legal frame.

## D. Clinical Practice and Healthcare Delivery

- 21. Respect for the Patient and Quality of Care**
- 21.1.** In clinical practice and all aspects of healthcare delivery, all professionals must respect patients and their rights, namely their dignity, autonomy and privacy while offering the best quality of care, treatment, and services.
- 21.2.** Information shall be provided to each patient regarding his or her rights and responsibilities, in an accurate, clear, courteous, and timely manner.
- 22. Privacy and the Right to Information**
- 22.1.** Everyone has the right to have their private life respected in relation to information directly or indirectly related to their health, as well as any information concerning personal data.
- Concurrently, everyone is entitled to know any information collected about their health.
- 22.2.** The wishes of individuals not to be informed shall be respected depending on the restrictions that exceptionally are applicable.
- 22.3.** Any information, including those obtained from the CF information systems about a person's condition, care, treatment, and medical data is absolutely confidential, with the exceptions determined by the applicable law.
- 22.4.** A patient's information (in any support available – files, reports, records, and others) should never be discussed with anyone, inside or outside CF, including in public areas, other than with those who are directly involved in the patient's care or those otherwise expressly consented by the patient.
- 22.5.** The patient's right to privacy regarding the collection and identification of personal information must always be respected and protected.

**23. Documentation and Record-keeping**

**23.1.** All CF community members who document in a medical record are responsible for the accurate, appropriate, clearly intelligible, and timely charting of the medical condition and care provided to any patient.

**23.2.** Any documentation must be completed in compliance with all medical staff bylaws, accreditation standards and relevant laws and regulations.

**24. Respect for Deontological Standards**

All health professionals must follow the deontological standards applicable to their professional categories.

**25. Respect for Patient's Autonomy and Informed Consent**

**25.1.** The respect for patients involves the respect for his/her autonomy, which implies the obligation to obtain free and informed consent from the patient, namely for all medical interventions, research, or data sharing with third parties in healthcare systems, as applicable.

**25.2.** Special attention and protection must be given to vulnerable persons or persons with diminished capacity or autonomy.

**26. Clinical Practice Guidelines and the use of Healthcare Resources**

**26.1.** Healthcare Professionals are to follow the best clinical practice guidelines for the specific patients and conditions they attend to.

**26.2.** If these are not to be followed, due to clinician council or patient decision, this should be appropriately discussed with the patient, expressly consented to, and documented with a specific and appropriate justification on the patient's notes and medical record.

**26.3.** In every circumstance healthcare resources shall be used according to the best clinical practice guidelines, (unless justified as above), in an appropriate, patient-centred and timely fashion with adequate use of funds and facilities.

## E. Research Activity

### 27. Honesty and Research Conduct

Researchers, in developing, undertaking, reviewing, reporting and communicating research, shall adopt a transparent, fair, complete and unbiased conduct.

### 28. Accountability of Research Activity

Decisions and actions involved in all steps of research procedures, from idea to publication, in their management and organisation, training, supervision and mentoring (and their wider impacts) must be accountable.

### 29. Research Procedures and Reliability of Research Practices

#### 29.1. Researchers shall:

- a. take into account the state-of-art when developing research ideas, ensuring the quality of their work, reflected in the design, methodologies, analyses and the appropriate use of resources;
- b. design, carry out, analyse, and document research in a rigorous, timely, and well-considered manner;
- c. treat all documentation in compliance with all medical and research staff bylaws, accreditation standards and relevant laws and regulations;
- d. have due regard for the health, safety and welfare of the community, collaborators, participants and others connected with their research;
- e. consider sex and gender dimensions in the development of research projects;
- f. report their results according to the highest standards of the discipline and, where applicable, in a way that can be verified and reproduced;

**29.2.** Research staff shall make proper and conscientious use of research funds and facilities and follow a balanced and sustainable use of CF funds.

### 30. General Standards and Safeguards

Researchers and all research staff shall:

- a. comply with all codes, regulations and policies relevant to their discipline;
- b. handle research subjects, be they human, animal, cultural, biological, environmental or physical, with respect and care, and in accordance with the applicable regulations and ethical standards;
- c. recognise, mitigate and manage potential harms and risks related to their research;
- d. anticipate possible social consequences of their research, to their best ability, and take steps to minimise their potential for harm.

### 31. Animal Welfare and Experimentation

**31.1.** CF community members, while using animals in research, shall conduct any research or teaching activity involving the manipulation of any live animal in accordance with the applicable international and national regulations and in the observance of the 3Rs (Replacement, Reduction, Refinement) rule, as well as the highest applicable ethical standards.

**31.2.** All research protocols which involve animal experimentation must always obtain approval from CF's ORBEA, as well as approval from the competent Portuguese legal authority.

**31.3.** All CF community members working with animals have to be duly trained and accredited according to the applicable regulations and laws.

For this purpose, an Animal Welfare Body (ORBEA – *Organismo Responsável pelo Bem-Estar dos Animais*) is in place at CF.

### 32. Research Integrity

**32.1.** All research must be conducted with integrity, fairness, and intellectual honesty, namely in the formulation, reporting and reviewing of scientific activity. Investigators must act with integrity in the acquisition, analyses, and presentation of research data.

**32.2.** Scientific misconduct – namely, among others, the manipulation of information or scientific documentation with the aim of producing results without validation or scientific support, as well as falsification or plagiarism – must be actively prevented in all circumstances, namely the writing of proposals, the implementation of projects and their assessment, and in scientific reports and publications.

### 33. Data Management

**33.1.** Research projects should include a Data Management Plan, specifying the research data the project will generate, how it will be collected and processed, and describing whether and how data will be acquired, analysed, used, shared and/or destroyed.

**33.2.** Research data and reports will be organised and preserved in line with the “FAIR” (Findable, Accessible, Interoperable and Re-usable), data management guidelines as appropriate and legally consented.

For this purpose, a *Data Management Policy* is in place at CF.

### 34. Communication, Publication, and Dissemination of Results

Researchers must publish results and interpretations of research in an honest, transparent, and accurate manner, with strict respect for the confidentiality of data or findings whenever applicable.

## F. Upholding the Code of Conduct

- 35.** This Code of Conduct is to be pro-actively enacted by all CF community members with a constructive and productive perspective.
- 36.** The observance of the Code of Conduct is to be ensured by all CF’s supervising channels and verified by the *Ombudsperson*, the Ethics Committee, and other applicable bodies, within the scope of their competences.
- 37.** The non-compliance with the Code of Conduct may imply its verification by the CF Board and the competent CF Departments and give rise to necessary action.
- 38.** Any changes to the provisions contained in current legislation are understood to be automatically applicable within the framework of this Code of Conduct.



## Code of good conduct to prevent and combat harassment at work

Considering,

The provisions of article 127, no. 1 k) of the prevailing Labour Code that foresee the adoption of “codes of good conduct for the prevention and combat of harassment at work (...) in the context of the legislation in force for the prevention of harassment<sup>1</sup>”, as well as other applicable legal provisions in force,

The provisions of article 29, no. 2 of the Labour Code, which defines *harassment* as “unwanted behaviour, notably that based on a factor of discrimination, practiced when accessing employment or in the employment itself, work or professional training, with the aim or effect of disturbing or embarrassing the person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilizing environment” and no. 3 of the same article and Code that defines *sexual harassment* as “unwanted behavior of a sexual nature, in verbal, non-verbal or physical form, with the objective or effect referred to in the previous number”,

The provisions of articles 1, 5, 6 and 8 of the Champalimaud Foundation Code of Conduct, CF’s commitment to creating a dignified, balanced, trusted, cordial and healthy environment, CF’s commitment to preventing and combating workplace harassment within the CF community, *The Code of Good Conduct for Preventing and Combating Harassment at Work*, attached to the Champalimaud Foundation Code of Conduct, in which the following measures are adopted:

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This Code is applicable to all people within the scope of CF’s activity, including health and research professionals, students and all members of the community, regardless of their contractual relationship with the institution.

<sup>1</sup>. Labour Code, in its version approved by Law No. 7/2009 of 12th February and in the version given by Law No. 73/2017 of 16th August.

## II

1. Harassment is understood as unwanted behaviour, namely that based on a factor of discrimination, practised when accessing employment or in the employment itself, work or professional training, with the aim or effect of disturbing or embarrassing the person, affecting their dignity, or creating an intimidating, hostile, degrading, humiliating or destabilising environment<sup>2</sup>.
2. Sexual harassment constitutes unwanted behaviour of a sexual nature, in verbal, non-verbal or physical form, with the aim or effect of disturbing or embarrassing the person, affecting their dignity, or creating an intimidating or hostile, degrading, humiliating or destabilising environment<sup>3</sup>.
3. The practice of behaviour classified as harassment is intolerable, as well as expressly and legally prohibited.
4. The legal consequences of harassment may be criminal, administrative, disciplinary and civil in nature, as expressly provided for in Portuguese legislation.

## III

5. The CF has means to prevent, combat and sanction the practice of harassment, providing any person who is the target of it or who is aware of it, with adequate means to report or complain.
6. Besides the legal means available at national level, the CF has adequate internal channels for submitting a report or complaint.
7. Any report and/or complaint must be presented to the Ombudsperson at CF through the following means:
  - a. in person;
  - b. by email: [ombuds@fundacaochampalimaud.pt](mailto:ombuds@fundacaochampalimaud.pt)
 and must be presented as follows:

2. According to article 29, no. 2 of the Labour Code in force.

3. According to article 29, no. 3 of the Labour Code in force.

a. in writing;

b. duly detailed and substantiated, and full collaboration must be provided as much as possible on the part of the reporter/complainant;

8. Following the report or complaint received, the Ombudsperson will initiate, in the shortest possible time, the necessary procedures for the summary appraisal of the facts presented.
9. For this purpose, in addition to the parties involved, third parties who could contribute to clarifying facts may be heard.
10. After verifying the existence of signs that could constitute a situation of harassment under the terms of the law, the Ombudsperson will prepare a detailed report with its conclusions and recommendations that will be delivered to the CF Administration.
11. After analysing this report, the CF Administration will make its conclusions, and may refer it to the competent legal department for the initiation of appropriate legal procedures.
12. The entire procedure is confidential, impartial and urgent, guaranteeing the protection of participants and witnesses.

