

THE 3 DOORS

ETHICAL VIOLATIONS POLICY AND PROCEDURES

- I. **Purpose.** The 3 Doors (the "3Ds") has established the 3Ds Ethics Council (the "EC") to promote ethical principles and policy and procedures for resolving ethical issues occurring in the context of any 3Ds' program or related activity. Specifically, the EC:
 - a. Maintains and updates the documents entitled The 3 Doors Code of Ethics ("Code of Ethics"), as well as The 3 Doors Ethical Violations Policy and Procedures (the "Policy and Procedures"), and The 3 Doors Ethics Complaint Form ("Ethics Complaint Form");
 - b. Requires all 3Ds teachers, presenters, leaders, employees, and students to read and sign these documents;
 - c. Investigates ethical violation complaints and determines whether ethical violations have occurred;
 - d. Determines sanctions for ethical violations; and
 - e. Develops organizational or program changes to promote 3Ds core values and commitments, and help 3Ds and its community members adhere to the Code of Conduct.

- II. **Ethics Council Members.**
 - a. Members. The EC is comprised of six members: The 3Ds Vice-President and/or Director of 3Ds, the Chairperson of the 3Ds Practitioners Association (3PA), one Senior Teacher (ST), and one representative each from the Europe (EU), North American (NA), and Latin American (LAA) 3Ds Academies.
 - b. Board Approval. These appointments must be ratified by 3Ds Board of Directors.
 - c. Duty to Recuse. If an EC member has a 'conflict of interest' or is otherwise unable to participate in any ethical review, investigation, finding, sanction, or determination with regards to a specific complaint, the member will recuse him/herself. If a member needs to be recused, he/she must write a letter or email to all EC members explaining the reasons for not participating in the matter. The EC will not replace this member, but will proceed with the remaining members.
 - d. Confidentiality. All EC members are bound to confidentiality for all cases brought before them. If a translator is needed, the translator is subject to the same rules of confidentiality as is any member of the EC.

- III. **Ethical Violations.** Ethical violations include but are not limited to:
 - a. Engaging in nonconsensual sexual contact, sexual contact, sexual harassment
 - b. Harassment or bullying of any kind
 - c. A teacher, leader, or presenter engaging in sexual and/or romantic contact with a student or mentee
 - d. Violating the confidentiality of a participant in a 3Ds program
 - e. Using positions of power and influence for financial or other personal gain
 - f. Misrepresenting one's qualifications, empowerments, or standing in the 3Ds community

- g. Teaching or presenting 3Ds practices outside the scope of one's 3 Doors authorization and
- h. Engaging in criminal activity of any kind.

IV. Who May Bring an Ethical Issue to the EC and Who Must Bring Ethical Concerns to the EC?

- a. Any 3Ds teacher, mentor, leader, employee, presenter, academy graduate, or student may bring ethical concerns to a member of the EC.
- b. While anyone may bring a matter before the EC, senior teachers have a Duty to Inform the EC of a clear ethical violation and/or threat of harm to self or other.
- c. All representatives of 3Ds have a Duty to Inform the EC of reports of physical and/or sexual abuse.

V. Ethical Council Complaint Procedure. If the EC becomes aware of a potential ethical violation, even if a Complainant has not come forward, it will proceed as follows:

a. Reporting an Ethical Complaint and Choosing the Resolution Process.

1. Reporting party is a Complainant:

- a. A Complainant is a person with a direct grievance with regards to the actions of the Accused. Only a person may be a Complainant. The 3 Doors or other entities are not Complainants.
- b. When a Complainant contacts the EC and provides a verbal or written complaint, an EC member will discuss the matter with the Complainant.
- c. The EC member will review the Code of Ethics and the Code of Ethical Violations Policy and Procedures documents with the Complainant and answer any questions that arise.
- d. The Complainant will then choose whether to move forward with the informal or formal process, if at all. However, in situations where the ethical violation allegations are deemed extreme by the EC, the EC may intervene and choose the process it deems appropriate.
- e. If the EC deems it necessary, the EC may choose to move forward with the investigation even if the Complainant decides to cease any involvement in the complaint or investigation process.

2. Reporting party is a third party or the violation does not involve a Complainant:

- a. If a third party informs the EC of a potential ethical violation or if the EC otherwise becomes aware of a potential ethical violation that does not involve a Complainant, the EC will gather additional information and contact relevant parties.
- b. If there is no Complainant or a Complainant does not come forward to submit a complaint, the EC will decide whether to pursue the matter as well

as the best process to follow using the processes described below as a guide.

- b. **Informal Process for Resolving Ethical Violations—the Council Circle.** In this model of restorative justice, the intention is to restore the sense of community through a dialogue of understanding, accountability, learning, and healing reconnection—coming together as a community to work toward a collective resolution grounded in our 3 Doors practices. The Process is as follows:
1. The EC, the Complainant, and the Accused form the Council Circle. After setting the stage for the issue, we sit in meditation and access our inner refuge through the doors of stillness, silence, and spaciousness, allowing the positive qualities available, to guide and ground our process.
 2. The Complainant speaks first in describing their situation, after which every EC member as well as the Accused, comments with respect, appreciation and compassion, not taking a side but reflecting what was said in a way that the speaker truly feels heard and understood, even if not necessarily agreed with.
 3. The Accused is asked to speak next about their experience, without justification and to describe their understanding of motivation/intention/awareness of the causes and conditions that preceded the alleged event.
 4. The Accused also needs to feel heard, thus the EC and Complainant reflect back what they heard with the same respect, appreciation and compassion offered earlier to the Complainant.
 5. Next, everyone in the Council Circle responds to the following questions: Is there clear recognition of the causes and conditions that resulted in this situation? Is there appropriate regret for the suffering that was caused? What does each of you need to repair/restore any harm/damage that occurred? What does each of you need to resolve this issue in order to engender a sense of safety, learning, and ultimate healing? Other appropriate questions may be asked.
 6. If no emergent resolution is clear, the EC will meet (without the Complainant and Accused) for a final decision, or the Complainant can choose to move to the Formal Process for Resolving Ethical Issues.
- c. **Formal Process for Resolving Ethical Violations.** In this formal process, the Complainant submits a written complaint to the EC. The EC decides whether to investigate the complaint. If the EC has enough information to move forward, it will

investigate the complaint. Lastly, if the EC finds that an ethical violation has occurred, it will determine sanctions.

3. Formal Complaint

- a. To initiate the process, the Complainant will complete and submit the 3Ds Ethics Complaint Form available at: <https://the3doors.org/the-3-doors-ethics-complaint-form/>
- b. The EC recommends that the Complainant submit the Complaint Form within 30 days.

2. Initial EC Process for Handling a Formal Complaint

- a. The EC will review the written complaint and determine within a week to 10 days if the alleged actions constitute an ethical violation and if there is enough information to make this determination.
- b. If the information is not sufficient, the EC will inform the Complainant who will be given 30 days to provide additional information. If no additional information is received within 30 days, the case will be closed.
- c. If the EC determines that the actions alleged constitute an ethical violation, the EC will proceed as follows:
 - i. The Accused will be informed in writing. This will include: (1) A letter or email to the Accused from the EC stating that a complaint has been filed; (2) a copy of the complaint; (3) a copy of the Code of Ethics and the Policy and Procedures; (4) a statement that information submitted by the Accused will be part of the investigation and shared with the Complainant.
 - ii. The EC will inform the Accused that no decision has yet been made and that the EC is available for questions.
 - iii. The Accused will then be asked to respond to the complaint in writing within 30 days of receipt of the EC's letter.
 - iv. If the Accused chooses not to respond, the EC will continue its investigation and determine whether an ethical violation has occurred, based on the complaint and the investigation. It will determine and enforce sanctions based on these findings.
 - v. If the Accused does respond, the EC will review their written letter of response and will schedule a meeting between the EC and the Accused within a mutually determined and reasonable length of time. This meeting will be recorded to insure that an adequate record is kept.

3. Investigation.

- a. Following the meeting, an investigation into the matter will begin. It may include review of documents, interviews of witnesses, requests for written

- statements by others, review of other written statements, further conversations with the Complainant and the Accused, and consultation with legal counsel.
- b. During the investigation, if deemed appropriate by the EC, the Accused may be required to take a leave of absence from any position held in the 3Ds organization.
4. EC process for determining whether a violation has occurred.
 - a. Upon completing the investigation, the EC will review the results of the investigation in an EC meeting. Then it will take a vote to determine whether an ethical violation has occurred. This decision will be based on a majority vote by EC members. Consensus is not necessary. If the EC splits 50-50, the Chair of the EC has the deciding vote.
 5. EC determines that the Accused did not commit an ethical violation.
 - a. If the EC determines that the Accused did not commit an ethical violation and that there is not sufficient basis on which to take the complaint forward, the Accused and the Complainant will be notified.
 - b. The case will be closed.
 - c. The EC will help the 3Ds community explore other ways to support either the Complainant or the Accused or both in moving forward.
 6. EC determines that the Accused committed an ethical violation.
 - a. If the EC determines that the Accused committed the violation, the EC will produce a written statement briefly describing the results of the investigations and the ethical violation(s) found.
 - b. The EC will then decide what sanctions, if any, are appropriate.
 - i. The EC will create a written statement explaining the sanctions, if any, and provide a date for their completion.
 - c. The EC will send a copy of both written statements to the Accused.
 - d. The EC will contact the Accused to go over the findings and sanctions and answer questions.
 - e. The sanctions will be kept confidential.
 - f. The EC will notify the Complainant of the ethical violation decision by the EC, offer a support person from the EC to keep them advised of the ongoing process, and assist in connecting to other resources if needed.
 - g. The EC will provide information about the sanctions to the Complainant as far as it is important for the resolution process for one or both parties.

7. Sanctions follow-up process and closing the matter.
 - a. Within 30 days of the date of completion of the sanctions, the EC will meet with the Accused. The Accused will share verbally and in writing how he or she met each of the sanctions.
 - b. After the Accused has met with the EC, the EC will reconvene to determine if the sanctions were adequately met through a majority vote. Consensus is not necessary. If the EC splits 50-50, the Chair of the EC has the deciding vote.
 - c. If the EC finds that the Accused did not adequately meet the sanctions or the EC determines that additional follow-up with the Accused is required, two EC members appointed by the EC will work with the Accused to create a plan for meeting the sanctions
 - d. When the EC's sanctions have been met, this matter will be considered closed.
 - e. The EC will notify the Accused that the case is closed and their status in the 3Ds will be reinstated—as teacher, presenter, leader, graduate, student, or employee.
 - f. If the Accused needs support with re-entering the 3Ds activities, the EC will appoint an EC member to provide this support or find resources to provide such support.
 - g. The EC will notify the Complainant that the Accused has complied with and adequately satisfied all sanctions. Or alternatively, the Complainant will be notified if the Accused does not comply with the sanctions, the final decision of the EC regarding the Accused, and the matter will be closed.
 - h. The EC will remind the Complainant and the Accused of the confidentiality of this matter—for the benefit of all involved.

VI. Sanctions:

- a. Sanctions may include but are not limited to:
 1. Formal warning and mediation and/or education session(s)
 2. On-going meetings with a 3Ds senior teacher or mentor
 3. Temporary suspension from teaching, presenting, mentoring, and/or participating in the 3Ds community programs and activities
 4. Permanent withdrawal of authorization to teach or present the 3Ds teachings and practices
 5. Temporary or permanent withdrawal of any 3Ds titles
 6. Permanent expulsion from participating in any 3Ds programs or organization activities.

- b. Sanctions are intended to provide an opportunity for a positive learning experience, increased knowledge, and a path for healing, through meditation practice and ethical accountability.
 - c. Sanctions are intended to prevent ethical violations from occurring in the future.
 - d. Sanctions are not intended to shame, harm, or punish.
 - e. If the EC cannot come to consensus on appropriate sanctions, the sanctions may be determined through majority vote. If the vote does not produce a majority regarding a particular sanction, the Chair will make the final decision regarding sanctions.
- VII. Care of Records:** The EC will fully document, securely maintain, and protect the confidentiality of all cases brought before it.
- VIII. Duty to Report Criminal Activity:** The preceding Ethical Violations Policy and Procedures is not intended to replace criminal investigations. All representatives of the 3Ds are required to refer complaints of criminal activity to appropriate government authorities.
- IX. Budget:** The 3Ds cannot offer monetary reimbursement for counseling within the 3Ds Academy with any teacher, mentor, or other 3Ds member, nor can the 3Ds pay for any outside consultation services.