

What needs to happen	Requirements	Legal requirements	Implementation	Issues
Reports will be made	Name of reporter Subject of report Details of incident Contact information Names of other involved parties/witnesses	Personal data is required to allow the CoC Team to investigate the report as appropriate Unambiguous consent is required to use this personal data. Data subject may withdraw this consent at any time The reporter will need to understand that some information provided via their report may be shared with the subject of the report. The parties should indemnify the CoC Team. [Do we need if we have insurance, and will need to be explained clearly]	Report form on RIPE NCC website which collects relevant information. Submitter will consent via form that their personal data will be used. The reporter will also confirm whether or not they have permission to submit witnesses personal data. The RIPE Meeting T&Cs will have been updated to highlight that if a report is made about someone, their personal data may be used. Attendees will also confirm that they indemnify the CoC team from liability due to their evaluation. The submitter may at any point request the withdrawal of their consent, in which case the report will be anonymised and archived. [The witness may at any point withdraw their consent, in which case the report is amended to	Are third party reports allowed? Further legal review into consent vs public interest as basis for the process of personal data. [Can the Submitter choose the CoC Team member to investigate the case, eg for sexual harassment cases, a female member may be preferred?]

			remove all personal data and they can no longer be considered a witness.]	
The CoC Team is Notified	System that sends email notifications, maintained by the RIPE NCC.	CoC Team will need to supply an email address and give consent to use for the purposes of the CoC reporting.	Once received, the reporting system sends an email to all CoC Team members, informing them that a report has been made. The email will simply state that a report has been made and include a link to a log-in system provided by the RIPE NCC.	Does a report go to the entire CoC team, or a smaller subset?
Reports will be accessed	Secure, web-based platform maintained by the RIPE NCC. Reports will need to contain contact information and details for follow-up.	The CoC Team will be informed of data protection obligations(*). It will be recommended not to download personal data of the reports to their own computers. If they do, they will be responsible for the processing of this personal data. Where possible, data should be given only to those who have a reason for accessing it.	Reports made via the web form will go directly to a log-in system provided by the RIPE NCC. Only the CoC Team, RIPE NCC Legal and Technical staff will have access to this system.	[Does the whole CoC Team have access to all information or only the members that deal with it?]

CoC Team investigates/makes its assessment	CoC will need to make contact with the relevant parties (reporter, subject of the report, other third-parties).	Any assessment must be based on concrete facts (who said what to whom on what day etc). If there are concerns about criminal activity, the Team should advise the submitter to follow up with a police report. For some offences, the CoC Team may be obliged to file a police report itself.	The CoC Team will coordinate according to its own workflow. Any calls or meetings can be facilitated by the group (the RIPE NCC will be available to support on request). The CoC Team produces its evaluation, including [recommended] course of action. RIPE NCC gives legal input on the evaluation before it is applied. In cases where the decision requires the RIPE NCC to take action (such as removing someone from the RIPE Meeting or banning them from future meetings), the RIPE NCC (Legal) would review the final report before it is archived. The RIPE NCC's Legal department would also be at the CoC Team's disposal to review reports	How many CoC Team members will be involved the making the final evaluation? Will other parties (NCC staff, RIPE Chair, WG chairs, perhaps independent legal counsel) also be involved? The "course of action" produced by the CoC Team - is that a recommendation, or a final ruling? So far the process described is suitable for something that takes place over a longer period (hours/days) - what if someone needs to get kicked from a social event <i>during</i> that event. Do we need a more streamlined process that allows for immediate decisions, or is this something the RIPE NCC does as event organiser?
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			more generally.	
Reports will be archived (for internal purposes)	Report itself Names of those involved.	Personal data can only be kept for as long as it is needed. Strong definitions of purposes are required here. Once purpose has been fulfilled, names should be deleted from the report.		To what extent do we need personal information of people involved, and for how long should this be kept?
(If a violation) the outcome is implemented:	An apology in person or an official apology - how do we know that this was done in an acceptable manner Mailing list ban/put into moderation Banned from future meetings Removed from an ongoing RIPE meeting Total ban from any and all community spaces Other?	The right to execute these decisions can be covered in the various RIPE NCC terms and conditions.		Terms and conditions becomes more complicated when applied to mailing lists. Note: "removal" can be complicated both with the RIPE Meetings and the mailing lists. I.e. we can ban a specific email account, but not prevent them from re-subscribing with another. We can expel an attendee from the meeting venue, but not from the hotel/neighbourhood.

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(*) The CoC Team will be asked to sign an NDA [and Data Processing Agreement]