

MEDIATION PROCESS – STEP 3

FIRST PRIVATE SESSIONS

- WELCOME BACK/THANKS FOR WAITING
- REMIND ABOUT CONFIDENTIALITY
If there's anything you don't want us to share with (name of other party), let us know. Otherwise, we will use the information to help you reach an agreement.
- ASK: **WHAT'S THIS BEEN LIKE FOR YOU?**
Ask follow-up questions. Reflect back their feelings.
- ASK ABOUT: **Remember to include follow-up questions & reflecting.*
 - THEIR ISSUES – *Tell us more about...*
 - RELATIONSHIP – *How do you know each other?*
 - COMMUNICATION – *Tell us about your past communication.*
 - THE USUAL – *How do you usually handle these things?*
 - ANYTHING TO ADD?
 - OTHER PARTY'S ISSUES – *If not already addressed.*
- SUMMARIZE ISSUES and FEELINGS
Prioritize Issues – Ask which is most important.
- CHECK-IN: *Anything we can't repeat?*
- TASK: *Think about ways to resolve this.*

~ TAKE A MEDIATOR'S BREAK ~

LISTEN TO 2nd PARTY IN SAME WAY
DON'T TRANSMIT OTHER PARTY'S INFO
YOU CAN LINK POSITIVES/AGREEMENTS