

# **Reporting by University Employees of Disclosures Relating to the Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence and the Preventing and Addressing Discrimination and Harassment, and Preventing and Addressing Retaliation Policies**

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**Policy Type** [University](#)

**Contact Office**

[Equal Opportunity and Civil Rights \(Office for\)](#)

**Oversight Executive**

[President of the University](#)

**Applies To**

Academic Division The Medical Center

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**Reason for Policy**

Consistent with Title IX of the Education Amendments of 1972 (Title IX) and other applicable state and federal law, this Reporting Policy outlines: (1) the options available to students and employees to report “Prohibited Conduct,” which term refers to conduct defined in [HRM-041: Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence](#), to University employees, and the obligations of University employees to respond to such disclosures, including the responsibilities of certain University employees, called “Responsible Employees,” to report such disclosures to the University’s Title IX Coordinator.

This Reporting Policy also outlines the options available to students and employees to report “PADHR Conduct,” which refers to conduct defined in policy [HRM-009: Preventing and Addressing Discrimination and Harassment](#) and policy [HRM-010: Preventing and Addressing Retaliation](#) (collectively, the PADHR Policy), and the obligations of University employees to respond to such disclosures, including the responsibilities of Responsible Employees to report such disclosures to the University’s Compliance Director for EOCR.

The University will treat Complainants and Respondents equitably by promptly offering supportive measures to a Complainant and by following the Title IX Grievance Process, Sexual and Gender-Based Misconduct Procedures, and/or Preventing and Addressing Discrimination, Harassment, and Retaliation (PADHR) Complaint Procedures, as applicable, prior to imposing any disciplinary sanction against a Respondent.

All University employees are also required to complete training every two years in order to understand their responsibilities in this area, including how to respond to disclosures of alleged Prohibited Conduct and PADHR Conduct.

**Definition of Terms**

**Complainant**

An individual who is reported to be the subject of conduct that could constitute a violation of the Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence or the PADHR Policy.

**Compliance Director for EOCR**

The person charged with monitoring the University’s compliance with the PADHR Policy and managing resolution of PADHR complaints under the PADHR Complaint Procedures.

**Employee Resource Guide for Prohibited Conduct**

The University's [Resource and Reporting Guide for Employees](#), for Reports of Prohibited Conduct provides complete information for employees about how to locate and access University and community resources for medical and healthcare assistance and support, how to obtain supportive measures, how to report Prohibited Conduct to the University and to law enforcement, and other information that may be useful to University faculty and staff who have experienced or witnessed an incident of Prohibited Conduct.

### **Evaluation Panel for Prohibited Conduct**

The panel that evaluates every report of Prohibited Conduct. The Evaluation Panel may include any and all members of the University's Threat Assessment Team and shall include, at a minimum: (1) the Title IX Coordinator, (2) a representative of the University Police Department, and (3) a representative from the Division of Student Affairs. In addition, the Evaluation Panel may include a representative from Human Resources and/or the Office of the Provost, depending on the circumstances of the reported incident and the status of the Complainant and the Respondent. A detailed description of the Evaluation Panel and the threat assessment process is set forth in the Title IX Grievance Process and the Sexual and Gender-Based Misconduct Procedures.

### **Formal Complaint**

A written complaint signed by the Complainant or the Title IX Coordinator, alleging conduct that implicates either the [Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence](#) or the PADHR Policy, and requesting the University take action.

### **Just Report It**

The University's [online reporting tool](#) for members of the University community to report of alleged Prohibited Conduct and PADHR Conduct, as well as bias and other forms of misconduct.

### **Office for Equal Opportunity and Civil Rights (EOCR)**

The Office for Equal Opportunity and Civil Rights is an administrative office within the University's Division for Diversity, Equity, and Inclusion, that includes the staff responsible for administering the [Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence](#) and the PADHR Policy.

### **Preventing and Addressing Discrimination, Harassment, and Retaliation Complaint Procedures**

The University's Preventing and Addressing Discrimination, Harassment, and Retaliation (PADHR) Complaint Procedures set forth the procedures for investigating and resolving reports of alleged PADHR Conduct under the PADHR Policy.

### **Reporter**

Any person, including students, faculty, staff, and third parties, who discloses an incident of alleged Prohibited Conduct or PADHR Conduct to the Title IX Coordinator, Deputy Title IX Coordinator, Compliance Director for EOCR, or a Responsible Employee. Reporters include any individuals who disclose such information, whether as Complainants, Respondents, or witnesses.

### **Respondent (1)**

Any person who has been reported to be the perpetrator of conduct that could constitute Prohibited Conduct or PADHR Conduct.

### **Responsible Employee**

Any employee of the University who is not a Confidential Employee.

For purposes of a reporter disclosing alleged acts of Prohibited Conduct and/or PADHR Conduct involving only University employees, Responsible Employees are: (1) any employee of the University who is not a Confidential Employee; and (2) is a supervisor, manager, human resources professional, or any University employee who has authority to institute corrective measures.

For purposes of a reporter disclosing alleged acts of Prohibited Conduct and/or PADHR Conduct involving a student at the University, Responsible Employees are any employee of the University who is not a Confidential Employee.

Responsible Employees include Teaching Assistants (TAs), Resident Advisors (RAs), and all other student-employees when disclosures are made to any of them when performing the duties of their employment/professional role.

### **Confidential Employee**

(1) Any University employee who is a licensed medical, clinical, or mental health, or other healthcare professional [e.g., physicians, nurses, physicians' assistants, psychologists, psychiatrists, professional counselors and social workers, and those performing services under their supervision (collectively, health care providers)], when performing the duties of that professional role; (2) any University employee when performing administrative, operational and/or related support for such health care providers; (3) any University employee who is an Athletic Trainer working under the supervision of a licensed medical or healthcare professional when performing the duties of that professional role; and (4) the University Ombuds when performing the duties of that professional role.

### **Sexual and Gender-Based Misconduct Procedures**

The University's [Procedures for Investigating and Resolving Reports of Sexual and Gender-Based Misconduct](#) setting forth the procedures for investigating and resolving reports of alleged Sexual or Gender-Based Misconduct under the Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence.

### **Sexual and Gender-Based Prohibited Conduct**

All of the conduct defined as "Sexual and Gender-Based Prohibited Conduct" in the University's [Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence](#), which includes Non-Consensual Sexual Contact, Non-Consensual Sexual Intercourse, Sexual Exploitation, Intimate Partner Violence, Stalking, Quid Pro Quo Harassment, Sexual and Gender-Based Hostile Environment Harassment, Retaliation, and Complicity.

### **Student Resource Guide for Prohibited Conduct**

The University's [Resource and Reporting Guide for Students](#), providing complete information for students about how to locate and access University and community resources for medical and mental-health assistance and support, how to obtain supportive measures, how to report Prohibited Conduct to the University and to law enforcement, and other information that may be useful to University students who have experienced or witnessed an incident of Prohibited Conduct.

### **Title IX Coordinator**

The person charged with monitoring the University's compliance with Title IX and the University's [Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence](#).

### **Title IX Grievance Process**

The University's [Grievance Process for Investigating and Resolving Reports of Title IX Prohibited Conduct](#) setting forth the procedures for investigating and resolving reports of alleged Title IX Prohibited Conduct under the Policy.

### **Title IX Prohibited Conduct**

All of the conduct as defined by the Department of Education Title IX regulations and defined in the [Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence](#) as "Title IX Prohibited Conduct" in the University's Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence, which includes: (1) Quid Pro Quo Harassment (by an employee); (2) Sexual Harassment; (3) Sexual Assault; (4) Dating Violence; (5) Domestic Violence; and (6) Stalking.

### **Policy Statement**

The University strongly encourages students who have experienced, witnessed or may otherwise have knowledge of Prohibited Conduct or PADHR Conduct to report such conduct to the University or to seek assistance from confidential resources at the University or in the local community. University employees bear different responsibilities with respect to information that may be disclosed to them about alleged Prohibited Conduct or PADHR Conduct.

All University employees are designated as either "Confidential Employees" or "Responsible Employees" and their respective responsibilities are described in detail below. All students, student employees, and employees (faculty and staff) should understand their reporting options and the consequences of disclosing information about alleged Prohibited Conduct or PADHR Conduct to a Confidential Employee or a Responsible Employee.

Employees who are uncertain as to whether they are required to report information disclosed to them about an incident of alleged Prohibited Conduct should consult with the Title IX Coordinator.

Employees who are uncertain as to whether they are required to report information disclosed to them about an incident of alleged PADHR Conduct should consult with the Compliance Director for EOCR.

Reporters who are uncertain as to whether a particular University employee is a Confidential Employee should ask before disclosing information they wish to keep confidential.

#### **I. Employee Responsibilities by Designation:**

**A. Confidential Employees:**

A Confidential Employee will not disclose information about alleged Prohibited Conduct or PADHR Conduct to the University's Title IX Coordinator, Compliance Director for EOCR, or to anyone else without the Reporter's written permission, subject to certain limited exceptions, as set forth below. The University has published a list specifying where students may access the services of Confidential Employees, including services at UVA Health (and its associated clinics) and the Elson Student Health Center.

**1. Limits of Confidentiality:**

Confidential Employees are required to maintain the confidentiality of information shared with them about alleged Prohibited Conduct or PADHR Conduct and will not disclose such information to the University's Title IX Coordinator, Compliance Director for EOCR, or to anyone else, except with the written permission of the Reporter or when such disclosures are permitted or required by applicable law or court order. For example, Confidential Employees may be required to disclose such information where there is a concern that the individual will likely cause serious physical harm to self or others or when the information concerns conduct involving suspected abuse or neglect of a minor under the age of 18. Questions about how to interpret the validity of any permission given or the applicability or scope of any law or court order requiring disclosure should be directed to the Office of University Counsel.

**IMPORTANT:** Reporters who disclose information to Confidential Employees should understand that, except in the limited circumstances described above, the information they have disclosed will not be shared with the Title IX Coordinator, Compliance Director for EOCR, or anyone else and, therefore, the University will not be able to use such information to provide supportive measures, facilitate a mutually acceptable Informal Resolution, investigate the alleged Prohibited Conduct and/ or PADHR Conduct, or to pursue disciplinary action against the Respondent.

**2. Supportive Measures:**

Confidential Employees may provide information to students, faculty, and staff where appropriate about how to obtain necessary health, including mental health, services and survivor advocacy services at the University and in the local community. Detailed information about where students and employees may access such services is set forth in the Student Resource Guide and Employee Resource Guide.

Students, faculty, and staff also may ask Confidential Employees how to request supportive measures (designed to address a Complainant's safety and well-being and continued access to educational opportunities). Examples of supportive measures include No Contact Directives (prohibiting contact between parties to an incident of alleged Prohibited Conduct or PADHR Conduct), academic modifications and support, or modifications to University residence, employment, and/or parking arrangements.

Confidential Employees should direct students, faculty, and staff who wish to request such supportive measures to the Title IX Coordinator (for Prohibited Conduct), the Compliance Director for EOCR (for PADHR Conduct), or to Student Affairs. *Students should understand, however, that EOCR/Title IX and Student Affairs employees are **not** Confidential Employees,*

*and thus will share any disclosures made to them about Prohibited Conduct or PADHR Conduct with the Title IX Coordinator and/or EOCR Compliance Director.* Complainants may be able to access a range of supportive measures with or without disclosing significant details about the alleged Prohibited Conduct and/ or PADHR Conduct. Complainants also may file a Formal Complaint or express preferences regarding University resolution. The University will honor such requests if it is possible to do so while also protecting the health and safety of the Complainant and the University community. With respect to Prohibited Conduct, such requests will be considered by the Title IX Coordinator, as described in the Grievance Process and Misconduct Procedures.

**3. Making a Report:**

A Reporter who first seeks the assistance of a Confidential Employee always has the right to report an incident of alleged Prohibited Conduct or PADHR Conduct to the University and/or to local law enforcement. In such cases, if the Reporter communicates to a Confidential Employee a wish to make a report, the Confidential Employee should support this decision and direct the Reporter to [\*Just Report It\*](#), the Title IX Coordinator, or the Compliance Director for EOCR so that a report can be made. Detailed information about University and law enforcement reporting options is set forth in the Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence and associated procedures and resource guides and the PADHR Policy and Complaint Procedures.

**B. Responsible Employees:**

**1. Prohibited Conduct:**

A Responsible Employee is required to report to the University's Title IX Coordinator all relevant details disclosed by a Reporter about an incident of alleged Prohibited Conduct, including the names and all other information that personally identifies the Complainant, the parties, any witnesses, and any other relevant information (e.g., the date, time, and specific location of the alleged incident).

**2. PADHR Conduct:**

A Responsible Employee is required to report to the Compliance Director for EOCR all relevant details disclosed by a Reporter about an incident of alleged PADHR Conduct, including the names and all other information that personally identifies the Complainant, the parties, any witnesses, and any other relevant information (e.g., the date, time, and specific location of the alleged incident).

**C. Disclosures:**

**1. Disclosures by Members of the University Community:**

If possible, before a Reporter discloses any information to a Responsible Employee, the Responsible Employee should explain the reporting obligations under this Policy. If the Reporter has not disclosed any information and indicates a desire to maintain confidentiality, the Responsible Employee should instead direct the Reporter to a Confidential Employee.

**a. Prohibited Conduct:**

Except for disclosures made (1) in the context of Public Awareness Events (e.g. "Take



Back the Night,” candlelight vigils, protests, “survivor speak outs” or other public forums in which students may disclose incidents of Prohibited Conduct; collectively “Public Awareness Events”), (2) during an individual’s participation as a subject in an Institutional Review Board-Approved human subjects protocol (“IRB Research”); or (3) when the disclosure is made in the course of academic coursework, including classroom discussion, papers, or other assignments, unless the disclosure was made to obtain help related to the issue, academic accommodations, extensions, etc. (“Academic Work”), or to a Confidential Employee, Responsible Employees are required to immediately report all relevant details about an incident of alleged Prohibited Conduct by a Reporter (including the names and all other information that personally identifies the Reporter, the Complainant, the Respondent, any witness, and/or any other third party with knowledge of the reported incident) and any other relevant information (including the date, time and specific location of the reported incident) to the University’s Title IX Coordinator through [\*Just Report It\*](#). This includes disclosures of Prohibited Conduct to supervisors (including department chairs, deans, and other unit administrators), management, and human resource professionals by University faculty and staff.

**b. PADHR Conduct:**

Except for disclosures made in the context of Public Awareness Events, IRB Research, or in Academic Work as described in more detail above, or to a Confidential Employee, Responsible Employees are required to immediately report all relevant details about an incident of alleged PADHR Conduct by a Reporter (including the names and all other information that personally identifies the Reporter, the Complainant, the Respondent, any witness, and/or any other third party with knowledge of the reported incident) and any other relevant information (including the date, time and specific location of the reported incident) to the Compliance Director for EOOCR or through [\*Just Report It\*](#). This includes disclosures of PADHR Conduct to supervisors (including department chairs, deans, and other unit administrators), management, and human resource professionals by University faculty and staff.

**2. Disclosures by Anyone of Prohibited Conduct or Sexual and Gender-Based Prohibited Conduct on Certain University Property:**

Although this Policy is directed primarily toward disclosures by University students to University employees about incidents of alleged Prohibited Conduct, consistent with the requirements of [Va. Code §23.1-806](#) (the “Virginia Reporting Statute”), Responsible Employees are also required to report to the Title IX Coordinator all information obtained, from any source, about any incident of alleged Prohibited Conduct that occurs “on campus, in or on a noncampus building or property, or on public property.” The Virginia Reporting Statute defines the terms “campus,” “noncampus building or property” and “public property” broadly to include, for example, all University Grounds (including residence halls); all contiguous (off-Grounds) property owned or controlled by the University; all property controlled by a student organization (including fraternity houses) or frequently used by students, wherever located; and public property (including streets, sidewalks and parking facilities) that is within or immediately adjacent to, and accessible from, Grounds. Responsible Employees are not expected to be experts in interpreting the Virginia Reporting Statute; any questions about whether to report such information should be directed to the Title



IX Coordinator. [The full text of the Virginia Reporting Statute can be viewed here.](#)

a. **University Actions Following Receipt of a Report to Title IX Coordinator:**

Upon receipt of a report of Prohibited Conduct, the Title IX Coordinator will promptly contact the Complainant to discuss the availability of supportive measures, consider the Complainant's wishes with respect to supportive measures, inform the Complainant of the availability of supportive measures with or without the filing of a Formal Complaint, and explain the process for filing a Formal Complaint. The Title IX Coordinator also will promptly forward all information then known to an Evaluation Panel. To the extent possible, information disclosed to a Responsible Employee will be shared only with (1) a limited circle of University employees who "need to know" in order to assist in providing supportive measures to the Complainant, conducting a health and safety risk assessment, or resolving the report in the event a Formal Complaint is filed or (2) as directed by the Evaluation Panel, with local law enforcement or the Prosecuting Authority (as defined in the applicable Procedures). A detailed description of the initial assessment, the threat assessment, and the range of available University supportive measures and actions following the threat assessment is set forth in the applicable procedures.

b. **External Reporting for Prohibited Conduct:**

Except (1) in the event of an emergency, (2) as may be directed by the Evaluation Panel, (3) where an incident has already been reported to law enforcement, or (4) as otherwise required by law, a Responsible Employee should not disclose information to law enforcement without the Complainant's consent. Any request for information from law enforcement should be referred directly to the Title IX Coordinator.

c. **Balancing Respect for the Agency and Autonomy of Complainants with the University's Obligations under State and Federal Law for Prohibited Conduct:**

Reporting all disclosures, reports or other known information about alleged Prohibited Conduct to the Title IX Coordinator allows the University to meet its state and federal obligations and to maintain an environment free from harassment and discrimination. Reporting such information to the Title IX Coordinator also provides the University with the best opportunity to:

- Contact the Complainant to discuss the availability of supportive measures.
- Consider the Complainant's wishes with respect to supportive measures.
- Inform the Complainant of the availability of supportive measures with or without the filing of a formal complaint.
- Explain to the Complainant the process for filing a Formal Complaint.
- Assess any health or safety risk posed by the alleged Prohibited Conduct.
- Take any other appropriate action to address the report.

In some instances, a Reporter may tell a Responsible Employee about an incident of Prohibited Conduct *but also* request (a) that their name and any other personally-identifying information not be shared with the Respondent or others, (b) that no investigation be pursued, and/or (c) that no disciplinary action be taken. The

Responsible Employee should communicate any such requests to the Title IX Coordinator<sup>1</sup>. In such cases, the University will seek to balance respect for the agency and autonomy of Complainants with the University's obligations under state and federal law. Accordingly, the University will seek to honor such requests if it is possible to do so while also protecting the health and safety of the University community, in accordance with the Title IX Policy and in compliance with state and federal law.

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<sup>1</sup>The [\*Just Report It\*](#) online reporting form permits Responsible Employees to indicate that such a request has been made. .

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With respect to Prohibited Conduct, a detailed discussion of the Evaluation Panel, the threat assessment process, and the University's response when a Complainant requests (a) that their name and any other personally-identifying information not be shared with the Respondent or others, (b) that no investigation be pursued, and/or (c) that no disciplinary action be taken, is set forth in the Grievance Process and Sexual and Gender-Based Misconduct Procedures.

**D. Disclosures by Anyone of PADHR Conduct on Certain University Property:**

Responsible Employees are required to report to the Compliance Director for EOCR all PADHR Conduct that occurs on University Grounds (including residence halls); all contiguous (off-Grounds) property owned or controlled by the University; all property controlled by a student organization (including fraternity houses) or frequently used by students, wherever located; and public property (including streets, sidewalks and parking facilities) that is within or immediately adjacent to, and accessible from, Grounds.

**a. University Actions Following the Compliance Director for EOCR's Receipt of a Report of PADHR Conduct:**

Upon receipt of a report of PADHR Conduct, the Compliance Director for EOCR will evaluate the report and promptly contact the Complainant to discuss the availability of supportive measures, consider the Complainant's wishes with respect to supportive measures, and explain the process for filing a Formal Complaint. The Compliance Director for EOCR will consult with other offices, such as Student Affairs or Employee Relations as necessary. A detailed description of the initial assessment and range of available University supportive measures and actions following receipt of a report or complaint is set forth in the PADHR Complaint Procedures.

**b. Additional Information:**

When a Reporter tells a Responsible Employee about an incident of PADHR Conduct *but also* requests that (a) their name and any other personally-identifying information not be shared with the Respondent or others, (b) no investigation be pursued, and/or (c) no disciplinary action be taken, the Responsible Employee should communicate any such requests to the Compliance Director for EOCR. In such cases, the University will seek to balance respect for the agency and autonomy of Complainants with the University's obligations under state and federal law. Accordingly, the University will seek to honor such requests if it is possible to do so while also protecting the health and safety of the University

community, in accordance with the PADHR Policy and in compliance with state and federal law.

## **E. Other Forms of Disclosure:**

### **a. Anonymous Reporting:**

Although the University encourages students to report Prohibited Conduct and PADHR Conduct, a Complainant may file an anonymous report:

- By mailing a letter to the Title IX Office or EOCR (without including identifying information).
- By calling the Title IX Office or EOCR using a blocked number.
- By emailing the [Title IX Coordinator](#) or [Compliance Director for EOCR](#) from a blocked email address.
- Having another University student file a report on the unnamed Complainant's behalf via [Just Report It](#) (which is behind Netbadge, requiring a reporter to use their UVA Id and Password).

An anonymous report will be evaluated in the same manner as a report with an identified Complainant. Once an anonymous report is submitted, it will be directed to the University's Title IX Coordinator or Compliance Director for EOCR, as appropriate, who will review the information provided and determine whether further action is necessary in order to protect the health and safety of affected individuals and the University community. Consistent with the provisions of the Title Grievance Process, the Sexual or Gender-Based Misconduct Procedures, and the PADHR Complaint Procedures, the University will respond to any report, including anonymous reports, with an initial assessment and threat assessment to determine available steps based on the nature and circumstances of any known information.

### **b. Off-Grounds Counselors and Advocates:**

Counselors, advocates, and healthcare providers in the Charlottesville community are not subject to this Policy and are not required to disclose information to the University unless the student requests and authorizes the disclosure and signs a consent or waiver form. A non-exhaustive list of such local counselors, advocates, and health care providers is available [here](#). Local advocates include the Sexual Assault Resource Agency, which, pursuant to a Memorandum of Understanding with the University, ensures immediate access to a confidential, independent advocate who can provide a trauma-informed response, including an explanation of available resources, support and reporting options to survivors of sexual assault and other forms of sexual misconduct and violence.

While such counselors, advocates and healthcare providers may maintain confidentiality vis-à-vis the University, they may have reporting or other obligations under state and federal law.

## **II. Training:**

All University employees must complete regular training at least once every two years in order to understand their reporting responsibilities under the University policies and procedures referenced above. The required online training is managed by EOCR/Title IX, in collaboration with the Division for Student Affairs and Employee Relations, and completion is tracked to verify compliance.

## **III. Responsibilities:**

**A. Responsible Employees:**

*Responsible Employees* are responsible for:

- Communicating to Reporters and/or Complainants who are considering disclosing or have disclosed information about alleged Prohibited Conduct or PADHR Conduct that, as Responsible Employees, they are required to report such information to the University.
- Reporting information they receive about alleged Prohibited Conduct or PADHR Conduct promptly through [\*Just Report It\*](#) or as described above.
- Completing all applicable University training on reporting requirements and staying current on training requirements.
- Contacting the Title IX Coordinator or Compliance Director for EOCR with questions or concerns.

**B. Confidential Employees:**

*Confidential Employees* are responsible for:

- Communicating to Complainants who are considering disclosing or have disclosed information about alleged Prohibited Conduct or PADHR Conduct that, except in the limited circumstances described in this Policy, the information they have disclosed will not be shared with the Title IX Coordinator or EOCR Compliance Director and that the University will therefore be unable to use such information to contact Complainant in order to discuss the availability of supportive measures, inform Complainant about the availability of supportive measures with or without the filing of a formal complaint, explain the process for filing a Formal Complaint, or for the University to move forward with any resolution process involving the Respondent.
- Understanding and providing information about available resources and support services.
- Supporting students who, following an initial confidential disclosure, decide to make a report to the University and/or local law enforcement, by directing such students to the appropriate University resources for assistance with such filing or further reporting.
- Serving as a resource to Responsible Employees regarding their responsibilities with respect to reporting alleged Prohibited Conduct or PADHR Conduct.

**C. Title IX Coordinator:**

The *Title IX Coordinator* is responsible for:

- Tracking changes in state and federal law which may require conforming modifications to this Policy, the Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence, the Grievance Process, and the Misconduct Procedures and ensuring that the University's policies and procedures for reporting of Prohibited Conduct disclosures are current.
- Communicating with Student Affairs, Employee Relations, and other University offices or units, as appropriate, to verify that all parties receive any necessary information, assistance and support, including appropriate remedial and protective measures.
- Monitoring institutional compliance with this Policy, including required training.
- Serving as a resource to the University community regarding their responsibilities with respect to reporting alleged Prohibited Conduct.

**D. Compliance Director for EOCR:**

The *Compliance Director for EOCR* is responsible for:

- Tracking changes in state and federal law which may require conforming modifications to this PADHR Policy and Procedures and ensuring that the University's policies and procedures for reporting of PADHR Conduct disclosures are current.

- Communicating with Student Affairs, Employee Relations, and other University offices or units, as appropriate, to verify that all parties receive any necessary information, assistance and support, including appropriate remedial and protective measures.
- Monitoring institutional compliance with this Policy, including required training.
- Serving as a resource to the University community regarding their responsibilities with respect to reporting alleged PADHR Conduct.

#### **IV. Compliance with Policy:**

Failure to comply with the requirements of this policy may result in disciplinary action up to and including termination in accordance with relevant University policies.

Questions about this policy should be directed to the [Office for Equal Opportunity and Civil Rights](#).

#### **Procedures**

[\*Just Report It\*](#)

#### **Related Information**

[HRM-009: Preventing and Addressing Discrimination and Harassment](#)

[HRM-010: Preventing and Addressing Retaliation](#)

[HRM-041: Policy on Sexual and Gender-Based Harassment and Other Forms of Interpersonal Violence](#)

[Infographic \(“Sexual and Gender-Based Violence: What Students Need to Know”\)](#)

Translation of this policy in Chinese, Spanish, or Korean, refer to the EOOCR website page on [Language Diversity](#).

#### **Policy Background**

Revised policy approved by the President of the University, effective beginning August 14, 2020.

**Major Category** [Human Resource Management](#)

**Next Scheduled Review** Saturday, August 14, 2021

#### **Revision History**

Added Compliance section 7/21/21; Revised 8/14/20; Corrected 6/9/17, Updated 5/10/17 (SGBHV Policy to Title IX Policy), Revised 10/27/16 (Code reference), 6/29/15, 4/2/2015.

#### **Applies To Text**

Academic Division (including all off-site locations) and the Medical Center.

#### **Category Cross Reference**

[Students and Student Programs](#)

**Last modified** February 5, 2024 - 3:07pm

**Approved By** President

**Approved Date** August 25, 2014 - 12:00pm