Drexel University

TITLE: SEXUAL HARASSMENT AND SEXUAL MISCONDUCT POLICY

POLICY NUMBER: CR - 2
EFFECTIVE DATE: September 1, 2013
REVISION DATE: February 3, 2025
SUPERSEDES: EIC – 3 Sexual Harassment and Sexual Misconduct
RESPONSIBLE EXECUTIVE: Executive Vice President, Treasurer, and Chief Operating Officer

I. PURPOSE AND APPLICATION

Drexel University seeks to foster a safe and healthy educational and employment environment built on mutual respect and trust. To further this mission, the University has adopted this Sexual Harassment and Sexual Misconduct Policy (referred to herein as "***Policy***"), which is intended to guide all ***University Community*** members.

The University is committed to providing an environment free from discrimination, including discrimination on the basis of sex. Sexual harassment and sexual misconduct are considered forms of sex discrimination. The University will not tolerate any form of sexual harassment or sexual misconduct, including, but not limited to, sexual assault, sexual violence, sexual abuse, stalking, intimate partner violence, and nonconsensual sexual conduct.[1]

The University encourages any individual who has been affected by sexual harassment or misconduct to immediately report the incident(s) giving rise to such concerns. This Policy provides several reporting options, which are outlined in Section VII below.

The University will respond promptly and equitably to all Reports of sexual harassment or misconduct and will take appropriate steps to eliminate any harassment or misconduct, prevent its recurrence, and address its effects. The University, as part of its response, will provide support and resources to any individual who reports an experience of sexual harassment or misconduct under this Policy.

[1] For information regarding the University's response to incidents of other forms of potential discrimination or harassment, including discrimination on the basis of sex or gender, please see the Policy on Prohibited Discrimination, Harassment, and Retaliation (CR-1).

The University has appointed a ***Title IX Coordinator*** to coordinate its compliance with Title IX, the federal law prohibiting sex discrimination at the University, and to serve as a resource to University Community members. For more information, please see the University's Title IX Resource Page, available at http://www.drexel.edu/titleix.

The University adheres to all federal, state, and local requirements for intervention, crime reporting, and privacy provisions related to sexual harassment and sexual misconduct. The University will record and report all relevant incidents in compliance with the Clery Act and the Campus SaVE Act.

This Policy will:

- Define sexual harassment, sexual misconduct and other forms of prohibited conduct that violate our community standards;
- Identify campus and community resources and support options available for all members of the University Community;
- Identify the Title IX Coordinator, the University's Deputy Title IX Coordinators, and their roles and responsibilities;
- Provide information as to how to make a Report of sexual harassment or misconduct to the University or law enforcement; and
- Outline the University's procedures for evaluating and resolving all matters reported to the University.

II. SCOPE

This Policy applies to all University Community members, which includes all Drexel University students, employees (including faculty, professional staff, and employees covered under Collective Bargaining Agreements)[2], trustees, officers, applicants for admission or employment, visitors, and third parties doing business or providing services on campus, including vendors, independent contractors, and consultants.

All University Community members are responsible for their actions and behavior, whether on campus, in the surrounding community, or in another location. As such, this Policy applies to any alleged conduct that impacts the University Community and/or the University's educational programs or activities, wherever it occurs, including on campus, off campus, and online.[2]

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[2] Drexel University is committed to maintaining an environment in which learning and discovery take place in a professional atmosphere of mutual respect and trust. While the University respects the privacy of its community members, Drexel recognizes that certain relationships in the work and educational setting have the potential to compromise, or appear to compromise, the fairness and objectivity of employment and educational decisions and the discharge of other professional duties. To understand the University's expectations regarding issues that may arise in the educational and employment environment around personal relationships, please see the following policies: Nepotism/Employment of Relatives & Consensual Amorous Relationships HR- 46 (http://drexel.edu/hr/resources/policies/dupolicies/hr46/) Amorous Relationships Involving Athletics Department Personnel and Student Athletes HR-46.01 (http://drexel.edu/hr/resources/policies/dupolicies/hr4601/)

III. IMPLEMENTATION

Implementation of this Policy is the responsibility of the Civil Rights Compliance team. For inquiries regarding this Policy, please contact the Equal Opportunity and Title IX Coordinator at civilrights@drexel.edu or 215-895-1405.

IV. STATEMENT OF POLICY AND PROCEDURE

A. NOTICE OF NON-DISCRIMINATION

The University is committed to establishing and maintaining an environment free from all forms of harassment and discrimination for all University Community members. The University does not discriminate on the basis of race, color, ethnicity, national origin, age, gender, sex, sexual orientation, gender identity or expression, physical or mental disability, religion, status as a veteran or special disabled veteran, genetic information, or any other protected class. See the Policy on Prohibited Discrimination, Harassment, and Retaliation (CR-1) for the University's policy and procedures regarding reporting, review, investigation, and resolution of concerns not related to sexual harassment or misconduct.

The University does not discriminate on the basis of sex in its educational, extracurricular, athletic, or other programs, or in the context of employment. Sexual harassment is a form of sex discrimination prohibited by Title IX of the Education Amendments of 1972, a federal law which provides:

> *No person in the United States shall, on the basis of sex, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any education program or activity receiving Federal financial assistance.*

The University is obligated by Title IX not to discriminate on the basis of sex. This obligation extends not only to current students and employees, but also to applicants for admission and employment. Sexual harassment is also prohibited under Title VII of the Civil Rights Act of 1964 and Pennsylvania law.

Inquiries About Title IX Applicability

Inquiries about the application of Title IX to the University or concerns regarding this Policy may be made internally to:

Blaze Bowers AVP, and Title IX/EEO Coordinator Civil Rights Compliance team

Drexel University
James E. Marks Intercultural Center
3225 Arch Street, Ground Level, Suite 011
Philadelphia, PA 19104
Phone: 215.895.1405
Email: civilrights@drexel.edu
Website: https://drexel.edu/eic/reporting/Title-IX/

Inquiries may be made externally to:

Office for Civil Rights (OCR)
U.S. Department of Education
400 Maryland Avenue, SW Washington, D.C. 20202-1100
Phone: (800) 421-3481
Fax: (202) 453-6012
TDD#: (877) 521-2172
Email: OCR@ed.gov
Web: http://www.ed.gov/ocr

Equal Opportunity Employment Commission – Philadelphia District Office
801 Market Street, Suite 1000
Philadelphia. PA 19107-3126
Phone: (800) 669-4000
Fax: (215) 440-2606
TTY: (800) 669-6820
Email: PDOContact@eeoc.gov

B. STATEMENT ON PRIVACY AND CONFIDENTIALITY

Issues of privacy and confidentiality play important roles in this Policy and may affect individuals differently. While they are closely related, the concepts of privacy and confidentiality are distinct terms that are defined below.

Privacy refers to the discretion that will be exercised by the University, including the Civil Rights Compliance team, in the course of any investigation or disciplinary processes under this policy. Information related to a report of Prohibited Conduct will be handled discreetly and shared with a limited circle of University employees or designees who need to know in order to assist in the assessment, investigation and resolution of the report and related issues. University employees will receive training in how to safeguard private information. The University will make reasonable efforts to investigate and address reports of Prohibited Conduct under this Policy, and information may be disclosed to participants in an investigation as necessary to facilitate the thoroughness and integrity of the investigation. In all such proceedings, the University will maintain the privacy of the parties to the extent reasonably possible.

The privacy of student education records will be protected in accordance with the Family Educational Rights and Privacy Act (FERPA). Access to an employee's personnel records is also governed by University policy and by applicable local laws.

Confidentiality refers to the statutory protections provided to individuals who disclose information in legally protected or privileged relationships, including professional mental health counselors, medical professionals, and ordained clergy (Confidential Resources). These Confidential Resources must maintain the confidentiality of communications disclosed within the scope of the provision of professional services. When an individual shares information with a Confidential Resource as a confidential communication in the course of a protected relationship, the Confidential Resource cannot disclose the information (including information about whether an individual has received services) to any third party without the individual's written permission or unless permitted or required consistent with ethical or legal obligations. Similarly, medical and counseling records cannot be released without the individual's written permission or unless permitted or required consistent with ethical or legal obligations.

When evaluating, addressing, and resolving any reported allegation of Prohibited Conduct, every effort will be made to respect and protect the privacy interests of the individuals involved. Such efforts will take into consideration the need for a thorough review of the matter, the need to ensure the safety and protection of any individual(s) involved and the safety of the broader University Community.

Information related to a Report of Prohibited Conduct will be shared on a "need-to-know" basis, meaning it will only be shared with those individuals who "need-to-know" specific information in order to assist in providing ***Supportive Measures*** and accommodations, and to assist in the resolution of a matter.[3] Students or employees wishing to obtain confidential assistance or access to campus resources without making a Report to the University may do so by speaking with professionals who are obligated by law to maintain confidentiality. These professionals, who are identified in Appendix E, include individuals in the Student Health Center, the Student Counseling Center, pastoral counselors within the Office of Religious and Spiritual Life, and the Employee Assistance Program.

All processes outlined in this Policy will be conducted in compliance with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, Title IX, any applicable federal, state and/or local laws and regulations and any other

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[3] Under the Title IX regulations, the University is required to keep confidential the identity of any individual who has made a report or complaint of sex discrimination, including any individual who has made a Report or filed a Formal Complaint of sexual harassment, any Complainant, any individual alleged to be the perpetrator of sex discrimination, any Respondent and any witness, except as may be permitted by Family Educational Rights and Privacy Act, as otherwise required by law or to carry out an investigation, hearing or judicial proceeding in compliance with this Policy.

relevant University policies. No information related to a specific case shall be released or disclosed, except as required or permitted by law or University policy.

All processes outlined in this Policy will be conducted in compliance with the requirements of the Family Educational Rights and Privacy Act (FERPA), the Clery Act, Title IX, any applicable federal, state and/or local laws and regulations and any other relevant University policies. No information related to a specific case shall be released or disclosed, except as required or permitted by law or University policy.

C. DEFINITIONS OF PROHIBITED CONDUCT

The University prohibits sexual harassment and sexual misconduct against all University Community members, regardless of sex, gender, sexual orientation, gender identity or gender expression. Prohibited Conduct, as set forth in this Policy, encompasses a broad range of unwelcome conduct of a sexual nature that is committed without ***Consent***, by force, intimidation, coercion or manipulation, or where a person is incapable of ***Consent*** due to incapacitation.

While the University is obligated to adopt certain definitions set forth under Title IX regulations, the University has chosen to expand Prohibited Conduct to include additional terms and to prohibit additional conduct that, while beyond the technical scope of the federal Title IX regulations, may impact the University Community or University Community members. Consistent with the University's core values, this Policy addresses both conduct prohibited by Title IX, as well as other acts of sexual misconduct.

A. Title IX Sexual Harassment [4]

(1) Sexual Harassment 1 (Hostile Environment): Unwelcome conduct on the basis of sex, determined by a reasonable person to be so severe, pervasive, and objectively offensive that it effectively denies a person equal access to the University's education program or activity.

(2) Sexual Harassment 2 (Quid Pro Quo): An individual conditioning the provision of a University aid, benefit, or service on another's participation in unwelcome sexual conduct.

(3) Sexual Assault: Sexual assault is having or attempting to have sexual contact with another individual without Consent or where the individual cannot Consent because of age or temporary or permanent mental incapacity (see below for definition of Consent and incapacitation). Sexual contact includes:

(1) Sexual intercourse (anal, oral, or vaginal), including penetration with a body part (e.g., penis, finger, hand, or tongue) or an object, or requiring another to penetrate themselves with a body part or an object, however slight; or

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[4] Federal regulations implementing Title IX require the University to define "Sexual Harassment" as conduct that:

a) meets one or more of the Definitions of Prohibited Conduct set forth in Section V, Paragraphs (A)(1) through (A)(6); and
b) occurred in the United States in a location, event or circumstance over which the University exercises substantial control over both the Respondent and the context in which the alleged Sexual Harassment occurred or took place, including any building owned or controlled by a student organization that is officially recognized by the University, such as a fraternity or sorority house. Sexual Harassment, as defined by Title IX, covers current students and employees, those seeking admission or employment and those seeking to participate in a program or activity of the University, such as alumni programs.

The University is required under Title IX to dismiss any portion of a Formal Complaint or allegation therein if, at any time during the Formal Resolution Process, it is determined that: (1) the conduct alleged in the Formal Complaint, if proved, would not constitute Sexual Harassment as defined under Title IX; (2) the conduct did not occur in an educational program or activity controlled of the University – meaning it did not occur in a location, event or circumstance over which the University exercised substantial control over both the Respondent and the context in which the alleged sexual harassment occurred; (3) the conduct alleged did not occur against a person in the United States; and/or (4) at the time of filing a Formal Complaint, a Complainant was not participating in or attempting to participate in the education program or activity of the University. In the event of a mandatory dismissal required by the Title IX regulations, a matter may still proceed through the University's Formal Resolution Process, so long as the remaining allegations set forth in the Formal Complaint, if proved, would constitute violations of this Policy. In the event that Title IX requires the University to dismiss a Formal Complaint, or any allegation therein, a Party may request an appeal of such a dismissal. Appeal procedures are set forth in Appendix A, Section VI (students) and Appendix B, Section VI (employees).

(2) Sexual touching of the private body parts, including, but not limited to, contact with the breasts, buttocks, groin, genitals, or other intimate parts of an individual's body for the purpose of sexual gratification.

(4) Dating Violence: Violence committed by a person who is or has been in a social relationship of a romantic or intimate nature with the victim. The existence of such a relationship shall be determined based on the reporting party's statement and with consideration of the length of the relationship, the type of relationship, and the frequency of interaction between the persons involved in the relationship. For the purposes of this definition:

- Dating violence includes, but is not limited to, sexual or physical abuse or the threat of such abuse.
- Dating violence does not include acts covered under the definition of domestic violence.

(5) Domestic Violence: Violence committed:

- By a current or former spouse or intimate partner of the victim;
- By a person with whom the victim shares a child in common;
- By a person who is cohabitating with, or has cohabitated with, the victim as a spouse or intimate partner; or
- By a person similarly situated to a spouse of the victim.

To qualify as Domestic Violence, the relationship between the ***Respondent*** and the alleged victim must be more than two people living together as roommates; the people cohabitating must be current or former spouses or intimate partners.

(6) Stalking: Engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (1) fear for their safety or the safety of others; *or* (2) suffer substantial emotional distress.

"Course of conduct" broadly captures the wide range of words, behaviors, and means that perpetrators use to stalk victims, and, as a result, cause their victims to fear for their personal safety or the safety of others or suffer substantial emotional distress. "Course of conduct" means two or more acts, including, but not limited to, acts in which the stalker directly, indirectly or through third parties, by any action, method, device or means, follows, monitors, observes, surveils, threatens, or communicates to or about a person, or interferes with a person's property.

"Reasonable person" means a reasonable person under similar circumstances and with similar identities to the victim.

"Substantial emotional distress" means significant mental suffering or anguish that may, but does not necessarily require, medical or other professional treatment or counseling.

B. Other Sexual Misconduct

(7) University Sexual Harassment (severe <u>or</u> pervasive): Any unwelcome sexual advance; request for sexual favors; or other unwelcome verbal or physical conduct of a sexual-based nature, when such conduct is severe or pervasive and has the purpose or effect of unreasonably interfering with an individual's access to University employment or educational opportunities by creating an intimidating, hostile, humiliating, demeaning, or sexually offensive working, academic, or social environment. The effect will be evaluated based on the perspective of a reasonable person in the position of a ***Complainant***.

A single or isolated incident may create a hostile environment if the incident is sufficiently severe. The more severe the conduct, the less need there is to show a repetitive series of incidents to provide a hostile environment, particularly if the harassment is physical.

(8) Non-Physical Intimate Partner Violence: Non-Physical Intimate Partner Violence includes a broad range of behavior and conduct directed toward an individual who is, or has been involved in, a sexual, dating, domestic, or other intimate relationship with the Respondent, when such conduct is severe or pervasive and has the purpose or effect of unreasonably interfering with an individual's access to work or educational opportunities by creating an intimidating, hostile, humiliating, demeaning, or sexually offensive working, academic, or social environment. Such conduct may include verbal, emotional, and economic abuse, as well as threatened acts of violence against a person or property.

(9) Sexual Exploitation: Sexual exploitation is an act or acts committed through non-consensual abuse or exploitation of another person's sexuality for the purpose of sexual gratification, financial gain, personal benefit or advantage, or any other non-legitimate purpose. See Appendix C for examples of behaviors that may constitute sexual exploitation.

(10) **Sexual Offenses Against Persons Under the Age of 18:** Includes photographing, videotaping, filming, or depicting on computer an individual under the age of eighteen (18) engaging in an actual or simulated sexual act, lewd exhibition of the genitals, or nudity, if such nudity is depicted for the purpose of sexual gratification; or knowingly disseminating, possessing, controlling, or displaying any book, magazine, pamphlet, slide, photograph, film, videotape, computer depiction, or other material depicting a child under the age of 18 engaging in an actual or simulated sexual act, lewd exhibition of the genitals, or nudity, if such nudity is depicted for the purpose of sexual gratification.

Additional information related to the protection of minors and reporting requirements for suspected or actual instances of child abuse can be found in the University's Protection of Minors and Reporting Child Abuse Policy (HR-73) at https://drexel.edu/hr/resources/policies/dupolicies/protection-minors/.

C. Retaliation

Retaliation includes words or acts, as described below, committed against an individual or group of individuals involved in a protected activity. Protected activity includes making a good faith Report or filing a ***Formal Complaint*** under this Policy; filing an external complaint; or opposing in a reasonable manner and consistent with University policy an action reasonably believed to constitute a violation of this Policy.

Retaliation also includes intimidation, threat, coercion, or discrimination against an individual for the purpose of interfering with any right or privilege secured by Title IX or its regulations, or because the individual has made a Report or Formal Complaint of Prohibited Conduct, testified, assisted, participated, or refused to participate, in any manner in any investigation, proceeding, or adjudication meeting under this Policy.

Retaliation can take many forms, including, but not limited to, adverse action or violence, threats and intimidation that would discourage a reasonable person (under similar circumstances and with similar identities to the targeted individual or group) from engaging in protected activity.

D. Statement on Consent and Incapacitation

Consent: Under this Policy, "Consent" is a freely and affirmatively communicated willingness to participate in sexual activity or behavior, expressed either by words or clear, unambiguous action. Consent consists of an outward demonstration indicating that an individual has freely chosen to engage in sexual activity. Consent may not be inferred from silence, passivity, lack or resistance or lack of active response. A person who does not physically resist or verbally refuse sexual activity is not necessarily giving Consent.

For this reason, relying on non-verbal communication can lead to misunderstandings.

Consent must be present throughout the sexual activity. At any time, a participant can communicate that they no longer Consent to continuing the activity. Engaging in sexual activity without Consent violates University policy and may result in criminal and/or civil liability.

Incapacitation: Incapacitation is the inability, temporarily or permanently, to give Consent because the individual is mentally and/or physically helpless due to drug or alcohol consumption, either voluntarily or involuntarily, or the individual is unconscious, asleep, or otherwise unaware that the sexual activity is occurring.

For additional information regarding the concepts of Consent and Incapacitation, please see Appendix F.

D. ROLE OF THE TITLE IX COORDINATOR

The Title IX Coordinator oversees the University's centralized review and resolution processes for all Reports of Prohibited Conduct. The Title IX Coordinator is supported by professional staff in the Civil Rights Compliance team, as well as University administrators who serve as Deputy Title IX Coordinators and Title IX Liaisons. For more information related to Deputy Title IX Coordinators and Title IX Liaisons, please see Appendix E.

The Title IX Coordinator, working with Deputy Title IX Coordinators and other relevant University administrators, will ensure that the University responds to and resolves all Reports in a timely, effective, and consistent manner. The Title IX Coordinator is also charged with implementing any appropriate Supportive and ***Protective Measures*** to ensure the safety of the University Community.

The duties and responsibilities of the Title IX Coordinator include:

- Responsibility for overall Title IX compliance, including notifying all students, employees, applicants for admission or employment, and unions of the University's obligations under Title IX and publication of the Title IX Coordinator's contact information, reporting options, and the applicable procedures, process, and options available after a Report is made;
- Oversight of Deputy Title IX Coordinators and Title IX Liaisons;
- Assisting any individual in identifying the appropriate University policy to resolve a Report in a prompt and equitable manner;
- Providing information and resources to all parties involved in a Report under this Policy;
- Acting as a central source for all sexual harassment and sexual misconduct allegations;
- Conducting annual and on-going climate checks, tracking, and monitoring sexual harassment and sexual misconduct allegations on campus; and

- Coordinating training, education, and prevention efforts related to issues covered under this Policy.

The Title IX and Deputy Title IX Coordinators are available to meet with any individual, whether a Complainant, a Respondent, or a ***Third Party***, to discuss Supportive Measures, campus and community resources, and procedural options. They can be contacted by telephone, e-mail, mail, or in person during regular business hours using the contact information listed below and on the Civil Rights Compliance team's website:

Blaze Bowers, AVP, and Title IX/EEO Coordinator
James E. Marks Intercultural Center
3225 Arch Street, Suite 011
Philadelphia, PA 19104
Phone: 215.895.1405
Email: civilrights@drexel.edu

E. REPORTING SEXUAL HARASSMENT AND SEXUAL MISCONDUCT

To enable the University to respond to all Reports in a prompt and equitable manner, any individual who wishes to report an incident of Prohibited Conduct under this Policy is encouraged to make a direct Report to the Title IX Coordinator, who oversees the University's Civil Rights Compliance team.

Any person may report sexual harassment or sexual misconduct, whether or not the person reporting is the person alleged to be the victim of such conduct. A Report can be made at any time, including during non-business hours, by contacting the Title IX Coordinator via email, telephone, mail, or by reporting in person during business hours, using the contact information listed below. A Report regarding an emergency situation or a matter requiring the immediate assistance of law enforcement can be made 24 hours a day, 7 days a week by contacting 911 or Drexel University's Department of Public Safety.

The University encourages all individuals, whether a Complainant or a Third Party, to report incidents of sexual harassment or misconduct involving a member of the Drexel community to the Title IX Coordinator and, if applicable, the Drexel University Department of Public Safety.

*If a report is made against a member of the staff of the Civil Rights Compliance team, the Report will be handled by the Office of General Counsel and any subsequent Formal Complaint will be investigated by an **Investigator** external to the University.*

A. Non-Emergency Reporting Options:

To report sexual harassment or sexual misconduct, please contact the Interim Title IX Coordinator: .

By Phone:	215.895.1405
By Email or Online:	Online: https://cm.maxient.com/reportingform.php?DrexelUniv&layout_id=6 Email: civilrights@drexel.edu
In person (during regular business hours):	James E. Marks Intercultural Center 3225 Arch Street, Ground Level, Suite 011 Philadelphia, PA 19104
Mail:	3141 Chestnut Street, 55G Philadelphia, PA 19104
Anonymously:	Drexel University Ethics Point 866.358.1010 (phone) www.drexel.ethicspoint.com (online)

B. Emergency/Immediate Reporting Options:

Any member of the University Community who has experienced or is aware of an incident of sexual harassment or misconduct is encouraged to seek the assistance of the Drexel University Department of Public Safety or call 911. A Report can be made 24 hours a day, 7 days a week.

Drexel University Department of Public Safety
3201 Arch Street, Third Floor
Philadelphia, PA 19104
215-895-2222 (Emergency) or call 911
TTY: 215.571.4141

Medical Treatment and Coordination with Law Enforcement: The University recognizes that in an emergency situation where a person's health or safety is at risk, trained policed officers are in the best position to quickly and effectively respond. We encourage all individuals to seek assistance from a medical provider and/or law enforcement immediately after an incident of sexual harassment or misconduct to address any concerns about personal safety and physical and emotional well-being. Please see Appendix D for more information about medical treatment and law enforcement.

Choosing Whether and Where to Report: The University recognizes that an individual's decision whether to report sexual harassment or misconduct is personal, and that there is no one "right" way to respond. Not every individual will be prepared to make a Report to the University or to law enforcement, and individuals are not expected or required to pursue a specific course of action. Moreover, an individual does not have to decide whether to request a specific course of action at the time the Report is made. The University recognizes that choosing to make a Report – and deciding how to proceed after making a Report – can be a process that unfolds over time. At all times, the University will seek to respect an individual's autonomy in making these important decisions.

There are confidential resources on campus and in the community available to individuals who may have experienced Prohibited Conduct, as defined under this Policy, even if they choose not to make a Report to the University. See Appendix E for more information.

As explained further in the Statement on Privacy, set forth in Section VI above, the University respects the privacy interests of all individuals. All information reported will only be shared with those individuals needed to coordinate the provision of Supportive or other measures, or to otherwise assist in the resolution of the matter.

Anonymous Reporting: Any individual may make an anonymous Report concerning an act of sexual harassment or sexual misconduct. An individual may report the incident without disclosing their name, identifying the Respondent, or requesting any action.[5] However, depending on the information available about a reported incident or the individuals involved, the University's ability to respond to an anonymous Report may be limited.[6]

Anonymous Reports may be made by telephone to Drexel University's Compliance Hotline by calling 866-358-1010 (Drexel University) or online at www.drexel.ethicspoint.com. The University's Compliance Hotline is EthicsPoint, an externally monitored service that allows anyone to report suspected misconduct or other

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[5] Mandated Reporters may not make anonymous Reports. Mandated Reporters are required to report all relevant details related to an incident of sexual harassment or misconduct, including, if known, the identities of the involved parties, as well as the date, time, and location of the alleged incident. For more information related to Mandated Reporters, see Section VIII below.

[6] If the alleged victim chooses to remain anonymous, for example, the Title IX Coordinator may be precluded from proceeding through the Formal Resolution Process set forth below.

issues. This service allows the person making the Report to confer anonymously with University administrators about additional details. All anonymous Reports of Prohibited Conduct under this Policy will be forwarded to the attention of the Title IX Coordinator while maintaining the reporting party's confidentiality.

A University employee who is a Mandated Reporter of sexual harassment or sexual misconduct cannot satisfy their reporting obligations by making an anonymous report.

Time Frame for Making a Report: There is no time limit on making a Report of sexual harassment or sexual misconduct to the University. However, Mandated Reporters are advised to satisfy their reporting obligations as promptly as reasonably possible after first becoming aware of reportable information under this Policy. All other individuals are strongly encouraged to report incidents of, or share information about, sexual harassment or misconduct as soon as possible after an incident occurs. The University's ability to provide adequate Supportive Measures or to adequately investigate allegations of Prohibited Conduct are greatly enhanced if information is reported to the Title IX Coordinator in a prompt manner. While the mere passage of time will not prohibit the University from investigating an allegation of Prohibited Conduct, the University's ability to access relevant evidence, parties or witnesses may be impacted.

Amnesty for Students Who Report Prohibited Conduct: The University encourages reporting and seeks to remove any barriers to reporting by making the procedures for reporting transparent and straightforward. The University recognizes that an individual who has been drinking alcohol or using drugs at the time of an incident may be hesitant to make a Report or provide information in connection with an investigation under this Policy because of potential Student Code of Conduct consequences for their own actions. When information is uncovered during the ***Initial Assessment***, ***Preliminary Inquiry***, or ***Formal Resolution Process*** that involves alcohol or drug use in violation of the Student Code of Conduct, such information typically will not be used to pursue any disciplinary action for alcohol or drug use.[7] The Office of Student Conduct may, however, initiate an educational discussion or pursue other educational remedies regarding alcohol or other drugs.

Statement Regarding False Allegations and Evidence: Deliberately false and/or malicious accusations under this Policy (as opposed to allegations which, even if erroneous, are made in good faith) are a violation of University policy and will be subject to appropriate disciplinary action. Additionally, witnesses and Parties knowingly providing false evidence or statements, tampering with or destroying evidence after being directed to preserve such evidence as part of the Formal Resolution Process, or deliberately misleading a University Official administering a process under this Policy may be subject to discipline under this or other University policies.

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[7] Exceptions to this general amnesty provision may include, for example, instances in which it is determined that an individual may have purchased, sold, or provided drugs or alcohol to others for the purposes of rendering them incapacitated or to facilitate an act of sexual misconduct.

F. EMPLOYEE RESPONSIBILITY TO REPORT SEXUAL HARASSMENT AND SEXUAL MISCONDUCT

Under this Policy, every employee of the University is designated as either a "***Confidential Employee***" or a "***Mandated Reporter***."

A Mandated Reporter is a University employee who is obligated to report incidents of sexual harassment or misconduct to the Civil Rights Compliance team. All University faculty and staff, including officers, deans, department heads, academic advisors, directors, and supervisors, and student employees or volunteers who are responsible for student or patient welfare are Mandated Reporters. Mandated Reporters are required to report all known details related to an incident of Prohibited Conduct, including, if known: the identities of the involved parties and witnesses; the date, time, and location of the alleged incident; and the details of the alleged incident.
Mandated Reporters should report any incident of sexual harassment or misconduct, regardless of whether or not the Mandated Reporter witnessed the incident or learned of it through a Complainant or third party. A Mandated Reporter should make every effort to advise a student of their mandatory reporting obligation before the student discloses sensitive information.

A Confidential Employee is any University employee who is a licensed medical, clinical, or mental health professional (e.g., physicians, nurses, psychologists, counselors, social workers, and those performing services under their supervision), when acting in that professional role to provide services to a patient who is a student or an employee of the University; or any employee explicitly designated as a Confidential Employee by the University. Except under certain circumstances, Confidential Employees are not required to report incidents of sexual harassment or misconduct to the Civil Rights Compliance team.[9]

Any questions regarding the existence or scope of an individual's reporting obligations under this Policy should be directed to the University's Title IX Coordinator.

Special Reporting Obligations for Suspected Abuse of a Child: All University employees are required to comply with all applicable laws regarding the protection of minors and reporting obligations for suspicion of child abuse or neglect. This includes, but is not limited to, any suspicion involving sexual violence against a child or the creation, possession, or viewing of child pornography. For more information, see the University's Protection of Minors and Reporting of Child Abuse Policy (HR-73) at https://drexel.edu/hr/resources/policies/dupolicies/protection-minors/.

G. INITIAL ASSESSMENT, PRELIMINARY INQUIRY AND SUPPORTIVE MEASURES10

1) Initial Assessment

The University will review and respond to all Reports of Prohibited Conduct which it receives. Upon receiving a Report, the University will conduct an Initial Assessment of the matter reported. During its Initial Assessment, the University will:

- Promptly contact the Complainant to discuss the availability of Supportive Measures, discuss the Complainant's wishes with respect to such measures and inform the Complainant of their options, including the process for filing a Formal Complaint.
- Determine if there is any immediate risk of harm to individuals or to the University Community and take necessary steps to address those risks, as set forth in Section X below.
- Evaluate whether the alleged conduct falls within the purview of this Policy.

The University's responsibility to conduct an Initial Assessment of all reported allegations of sexual harassment or misconduct exists regardless of whether it culminates in the initiation of the Formal Resolution Process (see Section XI below) and exists independently of any law enforcement processes that may be underway.

2) Preliminary Inquiry

After its Initial Assessment, the University will conduct a Preliminary Inquiry to determine whether the alleged conduct, if proved, would constitute a violation of this Policy. The University will not make credibility determinations in conducting its Preliminary Inquiry but will instead consider whether a Report of Prohibited Conduct, if assumed to be true, would constitute a violation of this Policy. If the University determines that the reported behavior or conduct, if proved, would *not* constitute a Policy violation, the University will notify the Complainant and inform the Complainant of other options and resources available at the University or within the community, as appropriate. The University may not proceed with the Formal Resolution Process (set forth below) for Reports of alleged behavior that would *not*, even if assumed to be true, constitute Prohibited Conduct under this Policy.

3) Supportive Measures

In connection with its Initial Assessment and Preliminary Inquiry, the University will determine the necessity and scope of any Supportive Measures. Supportive Measures are non-disciplinary, non-punitive, individualized services or actions that are taken or provided, free of charge to all parties and witnesses. Supportive Measures can be provided or considered even if no Formal Complaint is filed.

The University is committed to providing Supportive Measures on an individualized and ongoing basis throughout the resolution of a matter, depending on the known facts and circumstances of each case. The University's goal in providing Supportive Measures is to ensure equal access to its educational environment, including to the University's programs, activities, and opportunities, and to deter sexual harassment and sexual misconduct.

Even when a Complainant or Respondent does not specifically request that a Supportive Measure and/or Protective Measure (discussed in Section X below) be taken, depending on the nature of the Report, the University may choose to institute Supportive or Protective Measures, at its discretion, to ensure the safety of any individual, the broader University community, or the integrity of the Formal Resolution Process. Supportive Measures provided to a Complainant or Respondent are maintained as confidential, except in situations where such confidentiality would impede the ability of the University to provide those measures.

All individuals are encouraged to promptly report to the University's Title IX Coordinator any concerns related to Supportive Measures that have or have not been implemented with respect to any matter.

Supportive Measures may include, but are not limited to:

No Contact Agreement: A Complainant and/or Respondent may request, or the University may impose, mutual communication and contact restrictions to prevent further, potentially harmful interaction. Such communication and contact restrictions generally preclude in-person, telephone, electronic, or third-party communications. A student or employee can always request modification of a No Contact Agreement. The University may also limit an individual's or organization's access to certain University facilities or activities as part of the No Contact Agreement.

No Contact Order: A Complainant and/or Respondent may request, or the University may unilaterally impose, restrictions on the communication and contact between the Parties to prevent further, potentially harmful interaction. Such restrictions generally preclude in-person, telephone, electronic, or third-party communications. The University may also limit an individual's or organization's access to certain University facilities or activities as part of a No Contact Order. The University will consider modification of a No Contact Order upon the request of a ***Party***.

Academic, Employment, or Residence Modifications: A Complainant and/or Respondent may request an academic or employment accommodation or a change in residence after a Report of sexual harassment or misconduct. An individual who requests assistance in changing their academic, employment, or living situation after an alleged incident of Prohibited Conduct is reported will receive appropriate and reasonably available accommodations. As stated above, all accommodations are non-punitive, non-disciplinary, and are typically provided free of charge, whether or not a Formal Complaint has been filed. Examples may include, but are not limited to, the following:

- **Academic accommodations**, including a change in class schedule, taking an incomplete, dropping a course without penalty, attending a class remotely, using audiovisual platforms or other alternative means, providing an academic tutor, or extending deadlines for assignments
- Change in **housing assignment**
- Change in **work assignment**, location, or schedule
- Provision of an **escort** to ensure safe movement between classes and activities

Emotional Support: The University will provide counseling services through the Counseling Center, free of charge, or will assist in providing a referral to off-campus providers or agencies, as detailed Appendix E.

H. EMERGENCY REMOVAL AND ADMINISTRATIVE LEAVE

Where the Initial Assessment of a Report of sexual harassment or misconduct indicates an ongoing risk of harm to the safety or well-being of an individual or members of the University Community, the University may institute Emergency Removal (in the case of students) or Administrative Leave (in the case of non-student employees), regardless of whether a Formal Complaint has been filed. In all cases, the University will tailor the scope of any such removal or leave to the circumstances justifying their imposition, and will typically not seek to implement measures that are more restrictive than reasonably necessary to mitigate identified risks to the safety or well-being of individuals or the University Community.

Emergency Removal: Emergency Removal means a temporary restriction on an individual's access to the University's educational programs or activities, including but not limited to residential and academic facilities, as determined on a case-by-case basis.

A decision regarding Emergency Removal will only be made after the University conducts and documents a safety and risk analysis based upon the specific circumstances known at the time of the assessment. Emergency Removals will only be implemented if the University determines that a threat to the physical health or safety of a student or another individual, arising from the allegations of sexual harassment or misconduct, justifies removal. In circumstances where Emergency Removal is justified, and in cases of Administrative Leave, an individual or organization may be denied access to campus. When an individual is removed on an emergency basis, the University will provide the individual with notice of the decision, as well as an opportunity to appeal the decision immediately following removal.

Administrative Leave: Administrative Leave means a temporary removal from the work environment of a University employee, with or without pay, following an allegation of Prohibited Conduct or other similar circumstance, pending resolution of the matter under this Policy. Administrative Leave may include restricted access to the University's facilities and resources. A decision regarding Administrative Leave will be made based on the specific circumstances presented.

I. FORMAL RESOLUTION PROCESS: INVESTIGATION, ADJUDICATION, AND ALTERNATIVE RESOLUTION OF COMPLAINTS

1) Overview[11]

After an Initial Assessment and Preliminary Inquiry have been conducted, the University may implement its Formal Resolution Process. The Formal Resolution Process, which begins when a Formal Complaint is filed, offers two avenues for resolving matters: (1) ***Alternative Resolution*** or (2) ***Investigation and Adjudication***. In order to begin a Formal Resolution Process in any individual case, the following conditions must be met:

1) **A Formal Complaint has been filed.** The University may not proceed with any Formal Resolution Process in the absence of a Formal Complaint. Complainants are encouraged, but never required, to participate in the University's Preliminary Inquiry process and are likewise encouraged to file a Formal Complaint with the University if they wish to explore Alternative Resolution options or to request that the University proceed to Investigation and Adjudication.
2) **The Respondent is a member of the University Community.** In cases where a Respondent is not affiliated with the University, the Formal Resolution Process is not available to the Complainant. In such cases, the University will still conduct an Initial Assessment, offer Supportive Measures, and take appropriate action to eliminate a hostile environment.

Whether the Formal Resolution Process is applied to any individual case may depend on a variety of factors, including:

- whether the Complainant wishes to file a Formal Complaint;
- the risk(s) posed to any individual or to the University Community by not proceeding with the Formal Resolution Process; and
- the nature of the allegations and information known by the University at the time such a determination is made.

The Formal Resolution Process is guided by the principles of fairness and respect for all parties. Before any disciplinary action is taken, Parties will be provided with notice of the allegations, the opportunity to respond, and the opportunity to be heard. Resources are available to either Party to provide guidance and support throughout the Formal Resolution Process.

2) Formal Complaints

A Formal Complaint is a document signed (by hand or electronically) by the Complainant or the Title IX Coordinator that alleges Prohibited Conduct by a Respondent and requests that the University address the allegation(s) through the Formal Resolution Process. A Formal Complaint must be filed with or by the Title IX Coordinator, or their

designee, after meeting with a member of the Office for Institutional Equity and Inclusive Culture, even if a written Report was originally provided at the outset of the matter.

The University will consider any request from an individual outside the University to file a Formal Complaint on a case-by-case basis, after consideration of all the circumstances made known to the University, including the effect of the alleged Prohibited Conduct on the University Community, the location of the alleged misconduct, and the identities of the individuals alleged to have been involved.

The Title IX Coordinator also has the discretion to file a Formal Complaint. In evaluating the appropriate manner of resolution, including whether the Title IX Coordinator will file a Formal Complaint in the absence of a Formal Complaint by the Complainant, the Title IX Coordinator will consider the following factors:

- A Complainant's request that their identity remain confidential;
- The seriousness of the alleged conduct;
- Any potential threats to the safety of the individual(s) involved, as well as the safety of the broader University Community;
- The respective ages and positions of the Complainant and the Respondent;
- Whether there have been other Reports made or Formal Complaints filed against the Respondent;
- The Complainant's expressed wishes for a Formal Resolution Process;
- The Respondent's right to receive information under applicable laws and regulations;
- The University's obligation to provide a safe and non-discriminatory environment for all University community members.

In those instances when the Title IX Coordinator files a Formal Complaint in lieu of an alleged victim or Complainant, the Title IX Coordinator will notify the Complainant that the University intends to initiate an Investigation. The Complainant is not required to participate in the Investigation or in any related actions taken by the University.

The Title IX Coordinator or their designee also has the discretion to consolidate multiple Formal Complaints against a Respondent into one investigation if the evidence related to each alleged incident would be relevant in reaching a determination as to the other alleged incident(s).

In all cases where confidentiality is requested, the University will balance this request with its obligation to provide a safe and non-discriminatory environment and to comply with applicable law and regulations. When the University honors a Complainant's request for confidentiality after weighing all relevant factors, it will nevertheless continue to take steps to provide appropriate Supportive Measures to the Complainant in order to limit the effects of the alleged misconduct and to aid in the prevention of its recurrence.

Request for Confidentiality: If a Complainant requests that their name or other identifiable information remain confidential, the University will at all times seek to respect the request of the Complainant, and where it cannot do so, the University will

communicate with the Complainant about the reasons why the request for confidentiality cannot be honored. The University's ability to proceed to Formal or Alternative Resolution Processes may be limited by a request for confidentiality, however, as a Formal Complaint must typically disclose the identity of a Complainant if it is known. A Complainant may nevertheless always obtain Supportive Measures while keeping their identity confidential from the Respondent, to the extent such anonymity is reasonably possible while implementing the Supportive Measure(s).

3) Alternative Resolution

The University has developed an Alternative Resolution process to address reports of Prohibited Conduct in instances where use of the Investigation and Adjudication processes may not be requested or warranted.

The procedures for these resolution processes will be determined by the nature of the Respondent's membership in the University Community.

- See Appendix A for more detailed information regarding Alternative Resolution processes in connection with reports of Prohibited Conduct made against **Students**.
- See Appendix B for more detailed information regarding Alternative Resolution process in connection with reports of Prohibited Conduct made against **Employees**.

4) Investigation and Adjudication

Investigation

In cases where a Formal Complaint has been filed, a case may proceed to an Investigation. During an Investigation, the Investigator will meet with each Party and relevant witnesses and will collect and review evidence related to the allegations set forth in the Formal Complaint. Investigations will be impartial, fair, and thorough, and all individuals will be treated with sensitivity and respect. All Respondents will be presumed non-responsible until a ***Determination*** regarding responsibility is reached at the end of the Formal Resolution Process.

At the conclusion of the Investigation, the Investigator will prepare a draft ***Investigative Report*** that fairly summarizes the relevant evidence collected during the Investigation. The Parties will have an opportunity to inspect and review the draft Investigative Report, as well as other evidence collected as part of the Investigation that is directly related to the allegations raised in the Formal Complaint, even if such evidence was not deemed sufficiently relevant by the Investigator to be included in the draft Investigative Report. The Parties will have an opportunity to provide written feedback to the Investigator, who will consider such responses before finalizing the Investigative Report and issuing a ***Threshold Determination***. Depending on whether a student or employee is involved, the

Investigator's Threshold Determination will be forwarded to the Office of Student Conduct, the Office of the Provost, or Human Resources, as appropriate.

Adjudication

The University's Title IX Coordinator oversees the Resolution of any reported sexual harassment and sexual misconduct through the University's Formal Resolution Process, as outlined above, and as set forth in further detail in Appendix A (Students) and Appendix B (Employees). The Adjudication process will be determined by the nature of the Respondent's membership in the University Community:

- Formal Complaints involving student-Respondents will be resolved under the Student Code of Conduct. See Appendix A.
- Formal Complaints involving faculty- or staff-Respondents will be resolved utilizing the procedures outlined in Appendix B.

Sanctions for Prohibited Conduct

If any individual is found to have violated this Policy under the preponderance of the evidence standard, the University will address such Prohibited Conduct promptly and effectively through appropriate ***Remedies*** and/or ***Sanctions***. In the case of employees, sanctions may take the form of disciplinary action, up to and including discharge from employment. In the case of students, sanctions may include disciplinary action, up to and including expulsion. For more information about the sanctioning process, please see Appendix A (students) and Appendix B (employees). Third Parties who engage in Prohibited Conduct also may be sanctioned, including termination of the University's contract or other arrangements with such Third Party.

Even in cases in which the University does not conclude that a violation of this Policy has occurred, the University reserves the right to take further action as may be appropriate or warranted in order to meet its educational mission and to protect the rights and safety of its community members.

J. EDUCATIONAL PROGRAMS

The University educates its community about sexual harassment and sexual misconduct through diverse educational opportunities for faculty, professional staff, and students. These include, but are not limited to, mandatory employee training, educational programs for senior administrators and first responders, freshman, and transfer-student orientation programs each fall, and in-person programs for Residential Living, Athletics and Greek organizations.

Through tracking trends, the Civil Rights Compliance team is proactive about targeted training, as needed. The Civil Rights Compliance team and other University partners offer sexual assault education and information programs to University students and employees upon request. Literature on non-stranger rape education, violence prevention, bystander prevention programming, risk reduction, and University response is available through the Civil Rights Compliance team.

V. KEYWORDS AND DEFINITIONS (in alphabetical order)

Adjudicator means a person or persons granted the authority to make a Determination regarding the responsibility of a Respondent for allegations raised in a Formal Complaint pursuant to this Policy.

Advisor means a person chosen by a Party or appointed by the University to accompany the Party to any meeting, interview, or hearing related to the Initial Assessment, Preliminary Inquiry, or Formal Resolution Process, to advise the Party on those processes, and to conduct cross-examination on behalf of the Party at a hearing, if any.

Alternative Resolution means the process available for resolving a matter through the Formal Resolution Process without proceeding to Investigation and Adjudication. Alternative Resolution may take a variety of forms, including but not limited to a facilitated discussion, formal mediation between the parties, targeted or broad-based educational programming or training.

Complainant means an individual who is alleged to be the victim of conduct that could constitute sexual harassment or sexual misconduct, as defined in this Policy, or the victim of Retaliation for engaging in a protected activity.

Conduct Standards Board means a panel of trained faculty and professional staff who have been selected to serve as neutral representatives of the University in making Determinations of responsibility in cases of alleged violation(s) of this Policy and recommending Sanctions to be implemented following any such Determinations.

Confidential Employee means any University employee who is a licensed medical, clinical, or mental health professional, when that person is providing services to a patient or client who is a University student or an employee, or any other employee explicitly designated as a Confidential Employee by the University.

Consent means freely and affirmatively communicated willingness to participate in sexual activity or behavior, expressed either by words or clear, unambiguous action. For more detail, see Appendix F.

Day means a business day when the University is in normal operation.

Determination means a conclusion by the preponderance of the evidence as to whether there is sufficient information to conclude that the conduct alleged occurred as alleged and, if so, whether such alleged conduct constitutes a violation of University Policy.

Final Resolution refers to a written document, signed by the parties, outlining the terms of any agreement reached during the Alternative Resolution Process.

Formal Complaint means a document signed by a Complainant or the Title IX Coordinator alleging sexual harassment or sexual misconduct or Retaliation, against a Respondent and requesting that the recipient investigate the allegation. A Formal Complaint is required in order to begin participation in the Formal Resolution Process.

Formal Resolution Process is an umbrella term that refers to two paths available to Parties for resolving matters after a Formal Complaint is filed: (1) Alternative Resolution or (2) Investigation and Adjudication.

Initial Assessment means an evaluation conducted by the Title IX Coordinator or a Deputy Title IX Coordinator, upon receipt of any Report alleging sexual harassment or sexual misconduct under this Policy, to determine whether the alleged conduct falls within the purview of this Policy.

Investigation and Adjudication is one path of the two paths available to Parties for proceeding through the Formal Resolution Process, which entails an Investigation conducted by a trained Investigator, a live hearing in front of an Adjudicator or Conduct Standards Board, and a Determination as to whether Respondent is responsible for a Policy violation.

Investigator means the person(s) charged by the University with gathering facts about an alleged violation of this Policy, assessing relevance, synthesizing the evidence, and compiling this information into an Investigative Report and file of evidence directly related to the allegations raised in the Formal Complaint.

Investigative Report means a written document prepared by the Investigator that fairly summarizes all relevant evidence collected and reviewed during the course of an Investigation.

Party means the Complainant or Respondent.

Parties include the Complainant(s) and Respondent(s), collectively.

Policy means Drexel University's CR-2 Policy, the University's Sexual Harassment and Sexual Misconduct Policy.

Preliminary Inquiry means an evaluation by the Title IX Coordinator or a Deputy Title IX Coordinator to determine whether the alleged conduct, if proved, would constitute a Policy violation.

Protective Measure means measures designed to limit contact between the Respondent and Complainant, or between the Respondent and others who have been or may be impacted by the alleged conduct, which may include the University Community at large.

Remedies are measures directed toward the Complainant and/or the University Community to address safety, prevent recurrence, and restore equal access to the University's programs and activities after a Respondent is found to have violated this Policy.

Respondent means an individual who has been Reported to be the perpetrator of Prohibited Conduct, as defined in this Policy.

Retaliation means any adverse action taken against a person or group for making a good faith Report of Prohibited Conduct or participating, or choosing not to participate, in any process or proceeding under this Policy.

Sanction(s) means a consequence imposed by the University on a Respondent who is found to have violated this Policy.

Supportive Measure means non-disciplinary, non-punitive, individualized services or actions that are taken or provided, free of charge, to all parties and witnesses. Supportive Measures can be provided or considered even if no Formal Complaint is filed with the University. Supportive Measures may be designed to address individual safety and well- being and to promote fair access to adjudicatory and resolution processes. In determining appropriate Supportive Measures, the University is committed to maintaining fairness for all parties and to balancing the needs and interests of the individuals involved with the safety of the community as a whole.

Third Party means any other participant in the process, including a witness to the misconduct or an individual who makes a Report on behalf of another.

Threshold Determination means a determination reached by the Investigator after an Investigation as to whether the elements of a Policy violation have been sufficiently raised to proceed to Adjudication.

Title IX Coordinator is an official designated by the University to ensure compliance with Title IX, the University's Title IX program, and this Policy. References to the Title IX Coordinator throughout this Policy may also encompass a designee of the Coordinator for specific tasks.

University Community means Drexel University faculty, students, employees (including employees covered under Collective Bargaining Agreements), trustees, officers, and other members of the University community. It also applies to applicants for admission or employment, visitors, and third parties doing business or providing services on campus, including vendors, independent contractors, and consultants. When used in this Policy, "employee" generally refers to both professional staff and faculty members.

VI. RELATED POLICIES, FORMS AND RESOURCES

A. Related Policies

- Policy on Prohibited Discrimination, Harassment, and Retaliation (CR-1)
- Nepotism/Employment of Relatives & Consensual Amorous Relationships (HR- 46)
- Amorous Relationships Involving Athletics Department Personnel and Student Athletes (HR-46.01)
- Protection of Minors and Reporting Child Abuse Policy (HR-73)

B. Forms and Resources

1) Appendix A: Procedures for Resolving Reports Against Students
2) Appendix B: Procedures for Resolving Reports Against Employees
3) Appendix C: Examples of Prohibited Conduct
4) Appendix D: Law Enforcement and Medical Resources

5) Appendix E: Campus and Community Resources
6) Appendix F: Statements on Violence, Consent, and Incapacitation

VII. POLICY HISTORY

Revision Date: February 3, 2025
Revision Date: January 1, 2015
Revision Date: September 1, 2015
Revision Date: July 1, 2017
Revision Date: August 1, 2020
Revision Date: October 11, 2023