



BROWN

Sexual Harassment Policy  
Revised November 2011

## I. POLICY

### A. POLICY STATEMENT

Brown University, through its policies and procedures, seeks to provide an environment that is free from sexual harassment and sexual assault. Such conduct seriously undermines the atmosphere of trust and respect that is essential to a healthy work and academic environment.

This policy applies to all members of the university community in both on-and off campus Brown University sponsored events and activities. All members of the Brown community are encouraged to report promptly complaints about sexual harassment, sexual misconduct, and sexual assault to the grievance resolution officials. Persons found to be in violation of this policy shall be subject to disciplinary action which may include, but is not limited to, written warning, demotion, transfer, suspension, expulsion, dismissal or termination.

### B. DEFINITIONS

#### 1. Sexual Harassment

Sexual harassment is discriminatory, unlawful and will not be tolerated at Brown University. Sexual harassment may involve the behavior of a person of either sex against a person of the opposite or same sex, and occurs when such behavior constitutes unwelcome sexual advances, request for sexual favors, and other unwelcome verbal or physical behavior of a sexual nature where:

- a. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's education or employment;
- b. Submission to or rejection of such conduct by an individual is used as the basis for academic or employment decisions affecting the individual's welfare; or
- c. Such conduct has the purpose or effect of substantially interfering with an individual's welfare, academic or work performance, or creates an intimidating, hostile, offensive education or work environment.

#### *Examples of Sexual Harassment:*

Acts that constitute sexual harassment take a variety of forms. Examples of the kinds of conduct that may constitute sexual harassment include, but are not limited to:

1. Unwelcome sexual propositions, invitations, solicitations, and flirtations.
2. Threats or insinuations that a person's employment, wages, academic grade, promotional opportunities, classroom or work assignments or other conditions of employment or academic life may be adversely

affected by not submitting to sexual advances.

3. Unwelcome verbal expressions of a sexual nature, including graphic sexual commentaries about a person's body, dress, appearance, or sexual activities; the unwelcome use of sexually degrading language, jokes or innuendoes; unwelcome suggestive or insulting sounds or whistles; obscene phone calls.
4. Sexually suggestive objects, pictures, videotapes, audio recordings, computer communications, or literature placed in the work or study area, that may embarrass or offend individuals. Brown University adheres to the principles and traditions of academic freedom, and recognizes that these freedoms must be in balance with the rights of others, including the right of individuals not to be sexually harassed. It is understood that the principles of academic freedom permit topics of all types, including those with sexual content, to be part of courses, lectures, and other academic pursuits. Materials with sexual content that are used or displayed in an educational setting should be related to educational purposes.
5. Unwelcome and inappropriate touching, patting, pinching, or obscene gestures.
6. Consensual sexual relationships where such relationships lead to favoritism of a student or subordinate employee with whom the instructor or superior is sexually involved and where such favoritism adversely affects other students and/or employees.

Important: Sexual Harassment need not be intentional. Under Brown's sexual harassment policies, the intent of the person who is alleged to have behaved improperly is not relevant to determining whether a violation of Brown's policy has occurred. The relevant determination is whether a reasonable person could have interpreted the alleged behavior to be sexual.

## 2. Sexual Misconduct

Brown University prohibits sexual misconduct, defined as non- consensual physical contact of a sexual nature. It includes acts using force, threat, intimidation, or advantage gained by the offended student's mental or physical incapacity or impairment of which the offending student was aware or should have been aware. A charged student's use of any drug, including alcohol, judged to be related to an offense will be considered an exacerbating rather than mitigating circumstance.

- Sexual Assault

Title 11, Chapter 37 of the Rhode Island General Laws establishes three classes or "degrees" of sexual assault:

- a. First degree sexual assault - also called rape: Sexual penetration by a part of a person's body or by any object into the genital, oral or anal openings that occurs when there is a) force or coercion or b) mental or physical inability to communicate unwillingness to engage in an act of which the

accused is or had reason to be aware. Lack of consent does not necessarily require physical resistance or verbal refusal; for instance, someone who is asleep or very drunk may be considered unable to give consent.

b. Second degree sexual assault - Sexual contact (intentional touching of a person's genital area or buttocks, or a woman's breast) when there is a) force or coercion or b) mental or physical inability to communicate unwillingness to engage in an act of which the accused is or had reason to be aware.

c. Third degree sexual assault - is sexual penetration by a person 18 years or older of a person over 14 but under 16 years of age (the legal "age of consent").

Sexual assault is at one end of the sexual harassment continuum and may be a form of sex discrimination prohibited by Title VII and/or Title IX.

Sexual assault is a criminal offense under Rhode Island law, and may also be a civil offense under Title VII and/or Title IX.

### C. CONSENSUAL RELATIONSHIPS

#### 3. Within the Instructional/Employment Context

Faculty members and graduate teaching assistants are advised against having an amorous relationship with a student who is enrolled in a course taught by the faculty member or graduate teaching assistant or whose academic work (including work as a teaching or research assistant) is supervised or evaluated by the faculty member. This includes the medical school which has many categories of faculty or staff who work with medical students. Likewise, supervisors are discouraged from having an amorous relationship with students or an employee who is in their line of supervision.

#### 2. Outside the Instructional/Employment Context

Amorous relationships between faculty members and students (graduate teaching assistants, research assistants, etc. included) or between graduate teaching assistants and undergraduate students occurring outside the instructional context may also lead to difficulties. This is particularly true when the faculty member/graduate teaching assistant/student are in the same academic unit or in units that are academically allied. Moreover, relationships that the parties view as consensual may appear to others to be exploitative. In these types of situations, the faculty member/graduate teaching assistant may face serious conflicts of interest and should be careful to distance himself or herself from any decisions that may reward or penalize the student with whom the faculty member has or has had an amorous relationship.

#### 3. Professional Power Differential

Romantic and sexual relationships between faculty members and students and between supervisors and their employees do not necessarily involve sexual harassment. However, a faculty member who enters into a sexual relationship with a student (or supervisor with employee/student) where professional power differentials exist, must realize that if a charge of sexual harassment is subsequently lodged, it may be exceedingly difficult to prove mutual consent.

#### D. RESPONSIBILITY

Note: Sexual harassment need not be intentional. Under Brown's sexual harassment policies, the intent of the person who is alleged to have behaved improperly is not relevant to determining whether a violation of Brown's policy has occurred. The relevant determination is whether a reasonable person could have interpreted the alleged behavior to be sexual.

Individuals who are aware of or have experienced an incident of sexual harassment or sexual assault should promptly report the matter to one of the University Officials designated to receive informal or formal grievances. (Please see pp. 6-11 and pp.13-14.) A third party may also file a grievance under this policy if the sexual conduct of others in the education or work environment has the purpose or effect of substantially interfering with the third party's welfare, academic or work performance.

#### E. RETALIATION

No employee, applicant for employment, student, or member of the public shall be subject to restraints, interference, coercion or reprisal for action taken in good faith to seek advice concerning a sexual harassment or sexual assault matter, to file a sexual harassment/sexual assault grievance, or to serve as a witness or a panel member in the investigation of a sexual harassment/sexual assault grievance. Acts of retaliation are a violation of this sexual harassment/sexual assault policy and will be investigated and adjudicated accordingly.

#### F. MALICIOUS, FALSE ACCUSATIONS

A grievant whose allegations are found to be both false and brought with malicious intent will be subject to disciplinary action which may include, but is not limited to, written warning, demotion, transfer, suspension, dismissal, expulsion, or termination.

#### G. FEDERAL AND STATE LAWS AND UNIVERSITY POLICIES

Sexual harassment is a form of sex discrimination that is prohibited by law and policy including:

- Federal Law

- Title VII of the Civil Rights Act of 1964 (Employment)
- Title IX of the Education Amendments of 1972 (Education)
- State Law
  - Rhode Island Fair Employment Practices Act, Rhode Island Gen. Law 28-5-1
  - Rhode Island General Laws- sexual assault, Title 11, Chapter 37
- Brown University
  - Brown University Affirmative Action Plan
  - Faculty Rules and Regulations
  - Handbook of Academic Administration
  - Principals of Community Behavior
  - Office of Student Life Rights and Responsibilities
  - Human Resources Policies and Practices
  -

## II. PROCEDURES

An initial course of action for any faculty member, staff member, or student who feels that he or she is being sexually harassed is for that person to tell or otherwise inform the harasser that the conduct is unwelcome and must stop. However, in some circumstances this course of action may not be feasible, may be unsuccessful, or the individual may be uncomfortable dealing with the matter in this manner.

To encourage persons to come forward, the University provides several channels of communication, information, and both informal and formal grievance resolution procedures.

### A. INFORMATION, COUNSELING / ADVOCACY

Anyone may seek advice, information or counseling on matters related to sexual harassment/sexual assault without having to lodge an informal or formal grievance. Persons who feel they are being harassed, or are uncertain as to whether what they are experiencing is sexual harassment/sexual assault, and/or desire information as to their options in dealing with sexual harassment/sexual assault are encouraged to talk with University resource persons as described in the next section.

### B. WHERE TO GO FOR HELP

#### 1. STUDENTS

Students desiring assistance or wishing to report sexually harassing behavior:

The procedures for dealing with allegations of harassment towards students by faculty or staff differ from the procedures for dealing with allegations of sexual harassment towards students by other students. For alleged student-to-student harassment, call the Office of Student Life (x3-3145), or Administrator on Call (24hrs x3-4111). If the student is alleging harassment by faculty or staff, the

student should contact a sexual harassment information liaison.

#### Sexual Harassment Information Liaisons

Dean J. Allen Ward x3-3145

Dean Maria Suarez x3-3145

You may also direct complaints to:

Administrator on Call 24 hrs . x3-4111

Office of Student Life x3-3800

Department of Public Safety x3-3322 TDD x3-1740

Further information for students is available at the [Office of Student Life](#) website.

Alleged Sexual Harassment by Faculty or Staff:

Lina Fruzzetti  
Interim Director of Institutional Diversity,  
University Hall  
Box 1862 Campus  
863-2216

Wendy McRae-Owoeye  
Director of Staff Diversity and University Equal Employment  
Opportunity/Affirmative Action Officer  
Brown Office Building  
Human Resources Box 1879  
863-1787

Alleged Sexual Harassment by Students:

J. Allen Ward, Senior Associate Dean of Student Life  
20 Benevolent Street  
Box P, Campus  
863-3145

Brown University's Response to Student's Reports of Alleged Sexual Harassment:

Students should be aware that under guidelines issued by the Office of Civil Rights of the U.S. Department of Education, once an authorized officer of Brown University has actual notice of possible sexual harassment of students - whether carried out by employees, other students or third parties - Brown must take immediate and appropriate action to investigate or otherwise determine what has occurred, take steps reasonably calculated to end any harassment, eliminate a hostile environment if one has been created, and take reasonable steps to prevent such harassment from occurring again. These steps are Brown University's responsibility whether or not the student who was harassed makes a complaint or otherwise asks Brown to take action.

The scope of Brown's reasonable response to such notice may be impacted by a student's request for confidentiality or a request that the University take no action regarding the alleged harassment. The Sexual Harassment Information Liaisons will discuss confidentiality standards and concerns with the student initially. The student will be informed that:

- the request for confidentiality may limit Brown's ability to respond;
- Title IX prohibits retaliation and, if the student is afraid of reprisals from the alleged harasser, Brown will take steps to prevent retaliation and will take strong responsive actions if retaliation occurs.

If a student continues to ask that his or her name not be revealed, Brown will take reasonable steps to investigate the complaint consistent with that request, so long as doing so does not preclude Brown from responding effectively to the harassment and/or preventing further occurrences. Brown will evaluate the confidentiality request in the context of its responsibility to provide a safe and nondiscriminatory environment for all students. The factors Brown will consider in this regard include the seriousness of the alleged harassment, whether there have been other complaints or reports of harassment against the alleged harasser, and the rights of the accused individual to receive information about the accuser and the allegations if a formal proceeding with sanctions may result.

If a student requests to have his or her name withheld, Brown's efforts to stop the harassment may involve indirect efforts such as sexual harassment training and other steps aimed at preventing its recurrence, without initiating formal action against the alleged harasser or revealing the identity of the complainant. Students will be informed of the decision Brown makes and actions Brown decides to take.

Sexual Harassment Information Liaisons and other University personnel (including Deans, Advocates and Harassment & Assault Crisis Coordinators) are required to report incidents which are brought to their attention by students to the designated Title IX Compliance Coordinator (Associate Provost Fruzzetti for

alleged sexual harassment by faculty/staff; Dean J. Allen Ward for alleged sexual harassment by students). Among other benefits, this policy enables Brown to learn about or confirm a pattern of harassment based on claims by different students that they were harassed by the same individual. Please See Appendix C

for Sexual Harassment Reporting Form to be used students.

## 2. STAFF

Staff desiring assistance or wishing to report sexually harassing behavior:

Wendy McRae-Owoeye, Director of Staff Diversity &  
University Equal Employment Opportunity and Affirmative Action Officer  
(x3-1787)

Staff members who feel they may have been subjected to sexual harassment should report the incident as soon as possible and no later than thirty (30) days of the incident(s). In general, the investigation of the complaint of sexual harassment must be completed within thirty (30) days. The individual making the complaint will be informed of any delay and the reason for such delay, such as the unavailability of witnesses.

If the Human Resources Department is the initial recipient of the complaint, the staff member will complete a Sexual Harassment Reporting Form regardless of whether the investigation and resolution follows an informal or formal process. If the staff member wishes to pursue the alleged harassment formally, he or she will be referred to Human Resources, which will coordinate the investigation. Please see Appendix D for the Sexual Harassment Reporting Form used for staff members.

If the complaint is investigated and resolved at the supervisory or department level, a summary of facts of the incident, the investigatory measures and the resolution must be provided to the Human Resources Office within thirty (30) days of resolution.

## 3. FACULTY

Faculty desiring assistance or wishing to report sexually harassing behavior:

Dean of the Faculty	x3-2313
Dean of Medicine & Biological Sciences	x3-3330
Provost	x3-2706

Responses to allegations of sexual harassment by a faculty member are governed by the Faculty Rules & Regulations.

## 4. THE FOLLOWING EXTERNAL RESOURCES ARE ALSO AVAILABLE:

EXTERNAL RESOURCES (CITY, STATE, AND FEDERAL):

R.I. Commission of Human Rights (Title VII)                      Ph: 401-222-2661

Equal Employment Opportunity Commission Boston Office (Title VII)	Ph: 617-565-3200
Office of Civil Rights Region I, U.S. Department of Education	Ph: 617-223-9662
Providence Police Department	Ph: 401-272-1111
Attorney General of R.I.	Ph: 401-274-4400

Timelines for filing grievances with state and federal authorities:

- R. I. Commission for Human Rights : within one (1) year from the date of alleged harm.
  - Equal Employment Opportunity Commission: within one hundred eighty (180) days of the last alleged occurrence.
  - Office of Civil Rights: within one hundred eighty (180) days from the last date of the alleged discrimination.
- **GENERAL INFORMATION APPLICABLE TO STUDENTS, FACULTY AND STAFF**

Persons who feel they may have been subjected to sexual harassment are strongly encouraged to contact a University Resource person as outlined herein as soon as possible. Delay in reporting incident(s) may negatively affect Brown's ability to thoroughly address the reported incident(s). For example, witnesses may be unable to recall events due to the passage of time, witnesses may have gone on to other programs or employment, corroborating evidence may not be available, and/or intervening events may have occurred.

In all instances, the alleged harasser will be subject to the policy relevant to his or her University community status, i.e., student, faculty member or staff member. For example, if a staff member is alleged to have harassed a student, another staff member or a faculty member he or she will be subject to the sexual harassment policy for staff; if a faculty member is alleged to have harassed a staff member, another faculty member or a student he or she will be subject to the sexual harassment policy governing faculty. Alleged harassment by a student of another student is handled through Student Life in accordance with its non-academic disciplinary policies and procedures. The results of any investigation and actions taken by the University will be divulged only on a need to know basis.

In addition to discussing the options available under the sexual harassment policy, the University resource person will also discuss with the person other relevant considerations

such as:

1. the details of the informal and formal grievance process;
2. the issues involved;
3. possible resolutions;
4. provisions in the policy for protection of the grievant's interest (e. g., parameters of confidentiality; need for truthfulness by all parties; keeping the grievant fully informed of steps taken during the process; protection of the grievant and witnesses against retaliatory action);
5. provisions in the policy for protection of the interests of the accused (e. g., parameters of confidentiality; need for truthfulness by all parties, right to be notified of existence of any formal grievance; opportunity to respond to the grievant's allegations);
6. that use of an informal resolution method does not prevent the grievant from later deciding to use the formal method, nor does the use of any internal grievance method prevent the grievant from utilizing external grievance resolution resources.

Once the above information has been discussed with the person, the individual may then decide whether to:

- do nothing (rarely recommended);
- take personal action (such as a letter to the alleged harasser);
- request third-party informal resolution;
- request a formal investigation and resolution of the grievance.

When the person seeking assistance desires to utilize the Brown University Informal or Formal Grievance Resolution Procedures, the University resource person (if not an informal/formal resolution official) will make the referral and establish an appointment with the appropriate University informal or formal grievance resolution person as requested by the individual requiring assistance.

The Rhode Island Commission for Human Rights is a certified designated 706 agency authorized to handle job bias complaints referred from the federal Equal Employment Opportunity Commission.

### III. RESOLUTION PROCESS

#### A. INFORMAL GRIEVANCE RESOLUTION

The aim of the informal grievance resolution process is not to determine whether there was intent to harass but to ensure that the alleged offending behavior ceases and that the matter is resolved promptly at the lowest possible level. Intent is not generally relevant to defense of sexual harassment behaviors.

In fact, sexual harassment need not be intentional. Under Brown's sexual harassment policies, the intent of the person who is alleged to have behaved improperly is not relevant to determining whether a violation of Brown's policy has occurred. The relevant determination is whether a reasonable person could have interpreted the alleged behavior to be sexual.

No disciplinary action is taken in resolving informal grievances. Hence, informal grievance resolution procedures should not be used for severe cases of sexual harassment/sexual assault, nor should they be used when the alleged harasser has been the subject of a previous formal grievance.

Additionally, there is no requirement that the individual use informal procedures before filing a formal grievance, nor that the grievance be put into writing before informal resolution procedures are utilized. Likewise, the individual is free to withdraw from informal procedures altogether, file formally with the University, and/or file charges under federal and state law or use the courts.

In severe cases of sexual harassment/sexual assault or instances involving a repeated offender, the University may conduct a University-generated investigation if there is sufficient reason to believe that sexual harassment/sexual assault could have or does exist.

Some informal actions that may be appropriate are:

1. Writing a confidential letter to the alleged harasser informing him/her of the negative behavior, the resulting impact on the writer, and what the writer wants next, usually "I want the behavior stopped", or "I want to be treated the way a student or fellow employee should be treated".
2. Asking that a workshop be conducted for the unit/division.
3. Asking that someone speak to the alleged offender.
4. Meeting with the alleged offender and a third party to explain the grievant's feelings and the University's policy.

Possible outcomes of an informal process include:

1. The grievance is resolved to the satisfaction of both parties.
2. Grievance not resolved: In cases where resolution of the grievance is not possible, the University Resource Person will advise the grievant of the option of filing a formal grievance within the University and the options outside the University that may be pursued, i.e., filing with the R. I. Commission for Human Rights, EEOC, and/or the Office of Civil Rights.

## B. FORMAL GRIEVANCE RESOLUTION

The filing of a written grievance is generally required for the matter to be formally investigated and a determination made as to whether a violation of University policy prohibiting sexual harassment has occurred. The procedure and person handling formal grievances depend on the University community status of

the grievant and the University community status of alleged respondent. “University community status” refers to whether a person is a student, faculty member, or staff member. Accordingly, formal grievances are filed as follows: (Please note that for purposes of this discussion “student” is defined to include all students whether undergraduate, graduate or medical.)

If alleged sexual harasser is a: File grievance with:

Student	Senior Associate Dean of Student Life	(x3-3800)
Faculty member	Provost	(x3-2216)
Staff member	Human Resources	(x3-1787)

All formal investigating officials will conduct full, impartial, and timely investigations. Investigating officials will provide the respondent with the allegations, to which that individual will be required to respond in a timely manner. During the course of the investigation the formal investigating officials normally will interview the grievant, the respondent, and witnesses identified by each party. As previously indicated herein, to the extent possible, grievances will be handled confidentially, with the facts made available only to those who have a compelling need to know for purposes of investigation, resolution, or legal compliance.

For more detailed information, refer to the Faculty Grievance Procedure, Faculty Rules and Regulations, Handbook of Academic Administration, [the Office of Student Life](#) website, in particular, the policies and procedures for the non-academic disciplinary process, Tenets of Community Behavior, and the Human Resources Policies and Practices Manual.

The specific issues to be investigated/reviewed may include but are not limited to:

1. Whether the specific conduct has occurred and constitutes a violation of Brown's sexual harassment policies, the type(s) of conduct; frequency of occurrence; date(s) on which or time period over which the conduct has occurred; location of alleged occurrence and all factual circumstances upon which the grievance is based;
2. The specific relationship of the respondent to the grievant (e.g., professor-student, supervisor-employee, employee-student, etc.);
3. The effect of the respondent's conduct on the grievant, including any consequences that may be attributed to the conduct;
4. Whether the respondent is aware of the grievant's concerns;
5. Whether the department chair or supervisor is aware of the grievant's concerns;
6. The names of witnesses having factual knowledge of the circumstances surrounding the grievance;

7. Whether any prior steps were taken to resolve the grievance; and/or
8. Whether there are any additional resources that may be helpful to resolve the grievance.

Please Note: Sexual harassment need not be intentional. Under Brown's sexual harassment policies, the intent of the person who is alleged to have behaved improperly is not relevant to determining whether a violation of Brown's policy has occurred. The relevant determination is whether a reasonable person could have interpreted the alleged behavior to be sexual.

Some possible outcomes of a formal investigation include:

1. a finding that there is a reasonable basis for believing that the alleged violation occurred; or
2. a finding that there is no reasonable basis for believing that the alleged violation occurred; or
3. a finding that there is a reasonable basis that other misconduct may have occurred.

(This information will be provided to the appropriate University official for further consideration/action.)

### C. FORMAL SANCTIONS

Sanctions imposed upon offenders shall be commensurate with the egregiousness of the conduct and adequate and sufficient to demonstrate the University's commitment to taking strong and effective measures to both remedy and prevent the conduct.

- Decision to impose sanctions.  
If after reviewing the investigative report, the appropriate University official (as described below) concludes that there is a reasonable basis for believing that an alleged violation of the policy has occurred, and if a negotiated settlement of the grievance has not been achieved, formal sanctions will be imposed.
- University officials responsible for decision.  
The decision to impose formal sanctions will be made by one of the following University officials:
  - a. In cases involving a faculty member, (contract and/or adjunct), or other instructional personnel as the respondent, by the Provost or the Provost's designee.
  - b. In cases involving a staff person as the respondent, by the senior officer for the department/unit employing the charged party or by that person's designee.
  - c. In cases involving a student as the respondent, by the Senior Associate Dean of Student Life or the Dean's designee.

Appropriate sanctions may range from a written reprimand up to and including separation of the offending party from the University in accordance with established University procedures. In addition to the University disciplinary process, rape and other forms of sexual assault may be prosecuted criminally by the Attorney General of the State of Rhode Island. Use of the University procedures, or a lack thereof, does not preclude a grievant from filing charges under State criminal statutes. Both parties should be informed of the existence of their rights in other forums.

#### D. APPEALS

Respondents desiring to appeal the sanction(s) will do so through the corresponding channel depending on the University community status of the respondent. If the respondent is a student, the appeal is considered by the Provost, or the Provost's designated representative. If the respondent is a faculty member, the appeal is considered by the Committee on Grievance, which in turn shall make a recommendation to the President or to the Corporation as appropriate. If the respondent is a member of the University staff, the case is considered by the respondent's senior officer. In cases where the senior officer prescribed the sanctions, then the appeal will be considered by the President or the President's designated representative.

Appeals will normally be considered only when new evidence which was not reasonably available at the time of the formal investigation becomes available or when an allegation of substantial procedural error on the part of the investigator or investigatory process is made, or on the grounds that the sanction was excessively severe. The appeal authority shall have the power to affirm, reverse, or modify the decision and/or the penalty imposed (but not increase), or to remand the matter to the University official imposing the sanction for further consideration. Appeals must be submitted in writing detailing the specific reason(s) for the appeal.

The appeal must be submitted to the appeal authority which corresponds to the status of the respondent and must be filed within prescribed time frames. The appeal authority will provide a ruling generally within ten (10) working days from receipt of the appeal. The decision of the appeal authority is final.

### IV. EDUCATIONAL PROGRAMS

#### A. GENERAL

Education efforts are essential to the establishment of a campus milieu that is as free as possible of sexual harassment and in which high standards of conduct in consensual relations are observed. There are at least four goals to be achieved

through education: (a) notifying individuals of conduct that is prohibited; (b) ensuring that all faculty, staff and students are aware of their rights; (c) informing administrators about the proper way to address complaints of violations of this policy; and (d) helping educate the faculty, staff and students about the problems this policy addresses.

## B. PREPARATION AND DISSEMINATION OF INFORMATION

The Director of Institutional Diversity is charged with developing, coordinating, and disseminating the sexual harassment/sexual assault policy and procedure for the University. Accordingly, the Institutional Diversity Office will provide summaries of this publication to all current members of the University community and to all those who join the community in the future.

A summary of this publication will be included in student orientation materials and handbooks, including those distributed to students in graduate school. In addition, copies of this publication will be made available on the Web, at appropriate campus centers, offices, and will be distributed in sexual harassment/sexual assault prevention training sessions.

## C. TRAINING / EDUCATION

Sexual harassment/sexual assault prevention training, workshops, and professional development seminars are available. Please contact the Human Resources Office at x3-1787.

**Appendix A: Brown University Office of the Provost Information for Students About Sexual Harassment**

Sexual harassment is inconsistent with the Tenets of Community Behavior and cannot be tolerated. Sexual harassment is understood to encompass a wide range of behavior, including the coercion of a person into a sexual relationship, the subjection of the person to inappropriate verbal or physical sexual attention and retaliation for a refusal to comply with sexual demands. In an academic institution, where the integrity of the academic process and the mutual respect of faculty, students and administrators is so important, sexual harassment is of great concern.

Brown regards any behavior which is sexually harassing as a violation of the standards of conduct required of all persons associated with the University, whether by faculty, staff or students. If you feel you are being harassed by a member of the Brown community, you should take quick action.

The University has established procedures for dealing with potential discrimination, including sexual harassment. Resource persons have been designated to receive information, answer questions regarding University procedures and provide assistance to students who believe they have been subjected to racial and sexual harassment by faculty, staff or other students. The individuals identified this year are:

Sexual Harassment Information Liaisons:

ALLEGED HARASSER	INVESTIGATING OFFICE	CONTACT NAME	TELEPHONE NUMBER
Student	Office of Student Life	Dean J. Allen Ward	(401) 863-3145
		Dean on Call (24 hrs)	(401) 863-3411
		Police and Security	(401) 863-3411
Faculty	Provost Office or Office of Institutional Diversity	Lina Fruzzetti	(401) 863-2706 or (401) 863-2216
Staff	Office of Staff Diversity and University EEO/AA	Wendy McRae-Owoeye	(401) 863-1787

## ADDITIONAL RESOURCES FOR RELATED INFORMATION

- Staff - Human Resources Policies and Practices  
[http://www.brown.edu/Administration/Human\\_Resources/policies](http://www.brown.edu/Administration/Human_Resources/policies)
- Faculty - Faculty Rules and Regulations Handbook  
[www.brown.edu/Administration/Provost/handbook/handbook2009/4.html](http://www.brown.edu/Administration/Provost/handbook/handbook2009/4.html)
- Students - Office of Student Life, Rights, Responsibilities , and Conduct  
[http://www.brown.edu/Student\\_Services/Office\\_of\\_Student\\_Life](http://www.brown.edu/Student_Services/Office_of_Student_Life)
- Staff/Faculty/Students - Tenets of Community Behavior  
[http://www.brown.edu/Student\\_Services/Office\\_of\\_Student\\_Life/](http://www.brown.edu/Student_Services/Office_of_Student_Life/)

### Title IX Compliance Coordinators

The University also designates officers who are responsible for coordination and oversight of complaints of sexual harassment to ensure consistent practices and standards in handling these complaints. The following individuals have been identified as Title IX Compliance Coordinators:

#### Alleged sexual harassment by Faculty or Staff

Lina Fruzzetti, Interim Director of Institutional Diversity  
University Hall  
Box 1862 Campus  
863-2216

#### Alleged sexual harassment by Students

J. Allen Ward, Senior Assoc. Dean of Student Life  
20 Benevolent Box P, Campus  
863-3800

## **Appendix B: Brown University's Response to Student's Reports of Alleged Sexual Harassment**

Students should be aware that under guidelines issued by the Office of Civil Rights of the Department of Education, once an authorized officer of Brown University has actual notice of possible sexual harassment of students - whether carried out by employees, other students or third parties - Brown must take immediate and appropriate action to investigate or otherwise determine what has occurred, take steps reasonably calculated to end any harassment, eliminate a hostile environment if one has been created, and take reasonable steps to prevent such harassment from occurring again. These steps are Brown University's responsibility whether or not the student who was harassed makes a complaint or otherwise asks Brown to take action.

The scope of Brown's reasonable response to such notice may be impacted by a student's request for confidentiality or a request that the University take no action regarding the alleged harassment. The Sexual Harassment Information Liaisons will discuss confidentiality standards and concerns with the student initially. The student will be informed that:

- the request for confidentiality may limit Brown's ability to respond;
- Title IX prohibits retaliation and, if the student is afraid of reprisals from the alleged harasser, Brown will take steps to prevent retaliation and will take strong responsive actions if retaliation occurs.

If a student continues to ask that his or her name not be revealed, Brown will take reasonable steps to investigate the complaint consistent with that request, so long as doing so does not preclude Brown from responding effectively to the harassment and/or preventing further occurrences. Brown will evaluate the confidentiality request in the context of its responsibility to provide a safe and nondiscriminatory environment for all students. The factors Brown will consider in this regard include the seriousness of the alleged harassment, whether there have been other complaints or reports of harassment against the alleged harasser, and the rights of the accused individual to receive information about the accuser and the allegations if a formal proceeding with sanctions may result.

If a student requests to have his or her name withheld, Brown's efforts to stop the harassment may involve indirect efforts such as sexual harassment training and other steps aimed at preventing its recurrence, without initiating formal action against the alleged harasser or revealing the identity of the complainant. Students will be informed of the decision Brown makes and actions Brown decides to take.

Sexual Harassment Information Liaisons and other University personnel (including Deans, Advocates and Harassment & Assault Crisis Coordinators) are required to report incidents which are brought to their attention by students to the designated Title IX Compliance Coordinator (Associate Provost Lina Fruzzetti for alleged sexual harassment by faculty/staff; Dean J. Allen Ward for alleged sexual harassment by students). Among other benefits, this policy enables Brown to learn about or confirm a pattern of harassment based on claims by different students that they were harassed by the same individual.

**Appendix C: Brown University Sexual Harassment Reporting Form For Students**

The Brown University Sexual Harassment Reporting Form For Students is available from this website in Adobe PDF format. You will need Adobe's free [Acrobat Reader](#) to view/print the form.

[Download the Brown University Sexual Harassment Reporting Form For Students](#)

**Appendix D: Brown University Sexual Harassment Reporting Form For Staff**

The Brown University Sexual Harassment Reporting Form For Staff is available from this website in Adobe PDF format. You will need Adobe's free [Acrobat Reader](#) to view/print the form.

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