HEBREW UNION COLLEGE-JEWISH INSTITUTE OF RELIGION

Cincinnati, New York, Los Angeles, Jerusalem

SEXUAL HARASSMENT POLICY

A. POLICY

I. Policy Against Sexual Harassment

Hebrew Union College-Institute is a Jewish seminary, which trains rabbis, cantors, educators and communal workers, in addition to graduate students. Every person associated with the College-Institute should be treated respectfully at all times in accordance with our belief that every human being is created in God's image. People affiliated with the College-Institute are expected to abide by the highest moral values of the Jewish tradition, exemplifying the ideals which it proclaims. It is our expectation that every member of the College-Institute community shall work and study in an environment that is free from any kind of harassment. This policy specifically addresses sexual harassment that will not be tolerated at the Hebrew Union College-Jewish Institute of Religion. This policy applies to all faculty, staff, students and applicants for admission and employment and is to be followed in all employment practices, personnel policies, financial assistance and educational programs. We will not tolerate any form of sexual harassment or inappropriate sexual conduct by anyone, including visitors, vendors, or persons with whom we do business. Violation of this policy may result in disciplinary action up to and including termination and/or expulsion from the College-Institute community. Sexual Harassment is against the law and it is also antithetical to our religious tradition. When failure occurs, justice requires that we follow this policy and that we need to do teshuvah (repentance), ask for forgiveness, avoid repetition and make restitution when possible.

II. Definition of Sexual Harassment

Sexual harassment may involve behavior of a person of either sex against a person of the opposite or same sex.

Sexual harassment is defined as:

1. Unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature when
    a. submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or education.
    b. Submission to or rejection of such conduct by an individual is used as a basis for employment decisions or academic decisions affecting such individuals.

c. Such conduct has the purpose or effect of unreasonably interfering with an individual's welfare, work or academic performance or creating an intimidating, hostile or offensive working or academic environment.

2. 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:

a. Unwelcome sexual propositions, invitations, solicitations, and flirtations.
b. 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.
c. 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.
d. Sexually suggestive objects, pictures, videotapes, audio recordings, computer communications or literature placed in the work or study area, that may embarrass or offend individuals. The College-Institute 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.
e. Unwelcome and inappropriate touching, patting, pinching or obscene gestures.

While the above examples of conduct can be unlawful sexual harassment only if unwelcome and either severe or pervasive, the College-Institute reserves the right to impose discipline for the conduct in question without regard as to whether the conduct constitutes a violation of law.

3. Vignettes Exemplifying Sexual Harassment

The following vignettes exemplify the kinds of actions that might give rise to claims of sexual harassment under the College-Institute's policy, and, if the allegations were proven, might subject the harasser to disciplinary action:

a. Alex is failing one of the required courses. The instructor offers to help Alex in the evening at home. In the course of the evening, the instructor makes it clear that granting sexual favors will improve Alex's grade.
b. Lisa, an instructor, is invited by one of her senior colleagues to share a hotel room when they attend a professional meeting. When she refuses, the colleague accuses her of being immature and expresses doubts about her ability to handle professional situations.

c. Chris is a secretary in a department office. A co-worker regularly leaves pornographic pictures where Chris will find them. Chris dreads going to work because of the situation.
d. Lee is an Assistant Professor. The Dean has been initiating conversations about sex and has recently begun pressuring Lee for sex. When Lee refuses, the Dean threatens to see to it that Lee is not promoted.
e. Students in an elective course know that their professor is in a sexual relationship with one of their classmates. Although the professor and student try to be discreet about their relationship, the other students notice the special attention this classmate receives. They feel this creates a hostile learning environment in the class.

4. Vignettes Exemplifying non-Sexual Harassment

This set of cases shows clashes of beliefs or lifestyles but *not* instances of sexual harassment:

(a) Fran teaches a course in mythology which includes slide presentations of naked women and men, both "straight" and "gay." The pictures and their significance are discussed in class and written assignments are expected from the students. Two students who are offended by the pictures and upset about the assignments bring a complaint. The ombudsperson explains to them that the course title and catalog description clearly explained the goals of the course and suggests that they drop the course if they find the materials difficult to deal with.

(b) Jonathan is taking a course in literature and finds that one of the readings contains explicit descriptions of sadistic and scatological acts. He complains to his instructor that he is disgusted and offended by this material and cannot complete the written assignment on the topic. The instructor and the student discuss the situation and work out several solutions, such as completing a modified or alternative assignments; or dropping the course.

(c) Joan, a fifth year student, is invited by her thesis advisor to attend a professional meeting. Wondering whether this is a sexual advance, she asks what the housing arrangements will be and the professor responds that students are housed separately from instructors.

(d) Linda and her classmates are invited to dinner at the home of their instructor. The professor introduces them to her partner, Ms. Smith. Afterwards, Linda complains to the Dean that her beliefs are offended by the relationship between Ms. Jones and Ms. Smith. She says that she is unable to concentrate in class and wants to bring a sexual harassment grievance against the professor under the College's definition concerning atmosphere of the workplace. The Dean points out that the College-Institute has a policy committing it not to discriminate on the basis of sexual preference and that hers are not grounds for bringing a sexual harassment complaint against the professor.

(e) Jim is a new instructor at Hebrew Union College-Jewish Institute of Religion. A student in one of his classes repeatedly comments on his clothing and appearance, and makes suggestive comments when she comes to his office. Jim discusses his discomfort with a colleague who refers him to the ombudsperson, who suggests that he express his discomfort to the student and remind her of the College's Sexual Harassment Policy.

III. Consensual Relations

The integrity of the student-teacher relationship is the foundation of the educational mission of the College-Institute. This relationship vests considerable trust in the teacher, who, in turn, bears authority and accountability as a mentor, educator and evaluator. The unequal institutional power inherent in this relationship heightens the vulnerability of the student, as well as the potential for coercion. The same holds true for the relationship between senior faculty and junior faculty, mentors and mentees, and supervisors and employees. Therefore, the College-Institute strongly advises against such relationships.

While romantic and sexual relationships among administrators, faculty members and students, and between supervisors and employees may not involve sexual harassment, those who enter into a sexual relationship with a student or employee, where professional power differentials exist, must realize several things:

a. Such relationships can be detrimental to the educational process due to the creation of dual roles and may undermine the integrity of the supervision and evaluation provided. Such sexual relationships are often perceived by fellow students and coworkers as opportunities for favoritism and biased treatment when evaluations are carried out.

b. The College-Institute is committed to protecting the academic freedom and freedom of expression of all members of its community. However, that expression is subject to regulation when it causes injury and pain to others, or creates a hostile learning and/or work environment.

c. If a charge of sexual harassment is subsequently lodged, it may be exceedingly difficult to prove mutual consent.

IV. The College-Institute's Responsibility

Individuals who have experienced an incident of sexual harassment/sexual assault should promptly report the matter to one of the College-Institute's officials designated in this policy to receive this information. A third party may also contact a designated official 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 professional performance.

Any employee of the College-Institute who receives a complaint of sexual harassment or who otherwise learns of an alleged occurrence has the responsibility to take prompt steps (as defined in Section B.Iff) to ensure that the matter be addressed. While confidentiality cannot be promised, every effort will be made to treat with sensitivity information concerning an allegation of sexual harassment. The intent is to be respectful of all who are involved.

V. Retaliation

If you believe you have experienced or witnessed sexual harassment or inappropriate conduct, you should immediately follow the procedures provided in this policy. Steps will be taken to ensure that your concerns are promptly addressed. No student, faculty member, employee, applicant for admission or employment 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 matter, to file a sexual harassment grievance, or to serve as a witness or a panel member in the investigation of a sexual harassment grievance. Any act of retaliation is a violation of this policy and will be investigated and adjudicated accordingly.

VI. Malicious, False Accusations

A complainant 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.

VII. Provide Educational Resources

The College-Institute will inform all administrators, staff, faculty and students of the College's sexual harassment policy and available resources. The College-Institute shall provide an annual fall orientation for new students, faculty and staff in these matters, making clear the expectations of the members of our community regarding these issues. Student, faculty and staff handbooks will contain the policy and the names of individuals designated to receive concerns about sexual harassment.

Anyone may seek advice, information or counseling on matters related to sexual harassment without having to initiate an informal or formal grievance process. Persons who feel they are being harassed, or are uncertain as to whether what they are experiencing or doing is sexual harassment and/or desire information are encouraged to talk with the following persons who are the College-Institute's designated resource persons for sexual harassment information on their campus:

Cincinnati: Dean of Students, Director of Human Resources, or campus ombudsperson;

Los Angeles: Chair of ECASA, Director of Student Services or campus ombudsperson
New York: Associate Dean, the Fieldwork Coordinator, or the campus ombudsperson.

VIII. Federal and State Laws and Agencies

Sexual harassment is a form of sex discrimination and is against the law. It is explicitly prohibited by Title VII of the 1964 Civil Rights Act *as amended* and Title IX of the Education Amendments of 1972 as well as California Gov. Code 12940, New York Exec. LS 296 (6) and Ohio Rev. Code Ann. 4112.02 (A).

Further information about what constitutes sexual harassment or how to file a complaint is available from the following sources external to HUC-JIR. The time for filing grievances with state and federal agencies varies.

- The Office of Civil Rights (OCR) in the U.S. Department of Education, (Title VII and Title IX violations)

Chicago Office (for Cincinnati campus), (312) 886-8434
San Francisco Office (for Los Angeles campus), (415) 556-4275
New York City Office (for NY campus), (212) 637-6466
Ohio Civil Rights Commission (OCR), Cincinnati Regional Office, (513) 852-3344
The State of California Department of Fair Employment and Housing (DEFE), (800) 884-1684 (toll free for complaints and information)
The New York City Equal Employment Practices Commission, (212) 240-7902
The New York State Human Rights Commission on Discrimination Complaints (212) 306-7450

B. PROCEDURES

I. Procedures for Reporting and Resolution of Sexual Harassment Allegations

A. A. Where to begin:

People who feel they are experiencing sexual harassment are encouraged to inform the harasser that the conduct is unwelcome and should be stopped immediately. There are circumstances where this is not feasible, comfortable or effective. In these instances, persons should enlist the assistance of one of the College-Institute's designated resource persons listed in this policy, Section A.VII. Individuals who have questions about what constitutes sexual harassment or feel they may have been subjected to sexual harassment are strongly encouraged to contact one of the College-Institute's resource persons as soon

as possible. The College-Institute wants the opportunity to take prompt action to remedy these situations. The individual may be accompanied by a peer when meeting with the resource person.

Delay in reporting incident(s) may negatively affect the College-Institute's ability to respond effectively. For example, witnesses may be unable to recall events due to the passage of time, witnesses may have left the College, corroborating evidence may not be available and/or intervening events may have occurred. Normally, concerns should be brought to the attention of one of the designated College-Institute resource persons within six months of the incident, if a faculty or staff member is the complainant. If the complainant is a student, action should be taken as soon as possible but at least within six months after the incident and/or within six months after the student leaves the institution.

B. General Information

There are informal and formal processes for addressing incidents of sexual harassment within the College-Institute community. Using informal processes of resolution does not prevent the complainant from later deciding to avail him/herself of the formal grievance process. The College resource person will explain the options available under this sexual harassment policy, the details of the informal and formal grievance procedures, the issues involved and the intent to respect the interests of both the complainant and the accused.

After receiving information about the process, the individual may decide to:

- do nothing (rarely advisable)
- take personal action (such as a conversation with or a letter to the alleged harasser)
- request a third party, informal intervention by someone other than a College-Institute resource person (e.g., a peer speaking with the alleged harasser in order to sensitize him or her to the discomfort or humiliation that his/her actions have caused);
- request an informal grievance resolution using a College-Institute resource person;
- request a formal grievance resolution process.

If the individual decides to avail him or herself of the formal resolution processes, the resource person will assist the individual in setting up an appointment with the person responsible for those processes, which, depending on the circumstances of the claim, may be the Dean or Dean's designee, the Provost, the President or the Chair of the Board of Governors.

Involvement in the College-Institute procedures, or a lack thereof, does not preclude the complainant from filing charges with government agencies listed in Section A.VIII of this policy. Both parties should be informed of the existence of their rights in other forums.

Reports of sexual harassment or sexual assault, or assistance may also be sought from one of the following local sources outside the College-Institute:

Cincinnati:	Police Department, District #5, (513) 352-3578 or 911
	Women Helping Women Rape Crisis Center, (513) 381-5610
Los Angeles:	L.A. Police Department (213) 485-2582 or 911
	University of Southern California Security, (213) 740-6000
	L.A. Rape and Battering Hotline, (310) 392-8381
	Santa Monica Rape Treatment Center (310) 319-4000
	Los Angeles Commission on the Status of Women, (213) 485-6533
New York City:	Police Department, Sixth Precinct, (212) 741-4811
	Rape Crisis Hotline, 1-800/621-4673

C. 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. Intent is not usually relevant to defense of sexual harassment behaviors.

Usually no disciplinary action is taken in resolving informal grievances, hence, informal grievance procedures should not be used for cases of sexual assault, nor should they be used when the alleged harasser has been the subject of a previous formal grievance. When there is an over-riding interest of community safety, the College-Institute may require that allegations involving severe harassment/assault or a repeat harasser, once brought to the attention of a College-Institute resource person, be pursued through the formal investigative process as described in section D below. It is assumed that a complainant will understand and cooperate.

There is no requirement that the individual use the informal procedures before filing a formal grievance. Informal grievance processes may be used with or without filing a written complaint. The informal process may be conducted by the resource person with whom the individual first spoke or by a different resource person at the individual's discretion.

Options here include: writing a confidential letter to the alleged harasser describing the behavior and asking that it stop; asking that education be provided to the alleged harasser; asking a third party to speak with the alleged harasser; meeting with the alleged harasser with a third party present to explain the problem and the College-Institute's policy.

No report will be made of a conversation with a resource person as described in the General Information Section B above. Electing to use the informal procedure will result in a short report of the process to the Dean. The report will name the complainant and the alleged harasser and briefly describe the alleged behavior, the response of the alleged harasser, if any, to the allegation, and the steps taken to remediate the situation. The

report will be kept in a locked file in the Dean's office. It will not become part of the complainant's or alleged harasser's employment or student record. It will be read by the Dean only if another allegation involving either person is made. It will be destroyed seven years after departure from the College-Institute of both parties.

If the informal process does not resolve the problem to the satisfaction of the complainant, the resource person will remind the individual of the option of filing a formal grievance and the options that exist external to the College-Institute.

D. Formal Grievance Resolution Process

1. Initiating the Formal Grievance Process

The complainant shall submit a signed, written statement to the Dean. It should contain details of the alleged harassment, contact information for people who may supply information relevant to the allegations and briefly state what the complainant believes would constitute a just resolution of the situation.

The Dean will notify the alleged offender of the allegations and describe them orally without using the name of complainant. As soon as possible the Dean will appoint at least two people from a pool of trained community members to investigate the allegations.

2. The Investigation

A pool of individuals on each campus will be trained annually to investigate complaints and serve on grievance review panels. The pool will be drawn from administration/staff, faculty and students. The faculty pool members will be chosen by vote by the tenure-track faculty, the staff members by a vote of the staff and student representatives will be chosen by the student body. Individuals are not limited to one year's service. If the allegations involve the President, the Board of Governors may elect to retain a trained investigator from outside the College-Institute community who will follow these procedures.

In each case, an investigative team of no fewer than two persons will talk with all parties, with individuals named by the complainant and suggested by the respondent and anyone else whom the investigators deem appropriate. Prior to commencing the investigation, the investigators will obtain from the complainant and respondent a signed agreement to participate in the process. Refusal by the respondent to participate in the process may result in disciplinary action.

After obtaining the agreements to participate, the investigators will give the respondent a copy of the complaint. The respondent must provide the investigators with a written response within five days. A copy of the response will be given to the complainant upon receipt by the investigators. The investigators will then commence interviews. Any

written material provided by one party to the investigator during the investigation must be shared by the investigators with the other party unless to do so would jeopardize the safety of someone in the community.

The investigators will conduct a full, impartial and timely investigation. The privacy of the parties will be respected to the fullest extent possible. Information will be given to individuals other than the parties only on a "need to know basis" for purposes of the investigation, resolution or legal compliance.

Upon completion of the investigation, the investigators will prepare a report. It will note who was interviewed and any additional forms of information obtained. A summary of interviews will be included along with any relevant documents. The report, along with the original complaint and response, will be sent to the Grievance Review Panel at least two weeks prior to the Grievance Review Panel Hearing.

3. The Grievance Review Panel Composition

a. No one who investigates a complaint will serve on the Grievance Review Panel for that complaint. The investigators' role will be to present the report and answer questions from the panel. The Grievance Review Panel shall be constituted from the individuals available in the trained pool. A faculty member in the pool will chair in all cases involving faculty, an administrator in all cases involving a member of the administrative staff. In cases involving faculty/administration/staff combinations, or between students, the Panel shall choose its chair from among its members.

b. If one of the parties is a student and the other a member of the faculty, staff or administration, the Panel shall have four members, two from the same College category as the complainant and two from that of the accused.

c. If one of the parties is a member of the faculty and the other a member of the staff, the Panel shall have four members: two from each category as the parties.

d. If both parties are faculty, the Panel shall have three members drawn from the panel elected by the faculty, one of whom will serve as chair.

e. If both parties are staff, the Panel shall have three members; one drawn from the panel elected by the staff and two from administration, one of whom shall serve as chair.

f. If both parties are administrators, the Panel shall have three members drawn from the panel elected by the administration, one of whom will serve as chair.

g. If both parties are students, the Panel shall have three members, one each drawn from the student, faculty and administrative pools. The faculty or administrative representative shall serve as chair.

h. If one of the parties is the President, the Panel shall have three members from the Board of Governors.

4. Selection of Grievance Review Panel Members in Each Category

The Grievance Review Panel for each case shall be constituted by selecting members from the pool, alternating between alphabetical lists of female and male members, beginning with the first person who did not serve on the last constituted Committee. The Dean's office will facilitate this process as soon as possible as the investigators are appointed. The Dean shall ask the potential participants whether they have a conflict of interest or bias and, if so, they shall not serve. The chair may consult the College's approved legal counsel for advice.

5) Grievance Review Panel Procedures

a. At least one week prior to the hearing, the panel shall meet telephonically, electronically or in person with the investigators to review the investigators' report.

b. The Grievance Review Panel, not the complainant or respondent, has the burden of proof. The Panel constructs the proof from the material it assembles—primarily through the investigators. The Panel determines what evidence is relevant and what witnesses, other than the complainant and respondent, will be heard. The task of each party is to provide the investigators accurate and timely information throughout the process and to state clearly how the evidence relates to the allegations. The Panel may ask the investigators to provide additional materials prior to the hearing.

c. Once the Panel has met initially and reviewed the investigators' materials, the materials to be used or referenced in the hearing will be given to both parties, unless to do so will seriously jeopardize the safety or well-being of any member of the College-Institute community. Any materials given to one party must be given to the other.

d. Both parties will receive at least one week's advance written notice of the time and place of the hearing.

e. The investigators will attend the hearing and deliberations as resource persons, but will not participate in questioning any witnesses or vote on findings or sanctions.

f. Each party speaks individually with the Panel. The other party is not present. The party may be accompanied by and confer with a support person of his or her choosing, including legal counsel, but only the party is allowed to speak directly to the Panel. The College-Institute may also invite its legal counsel as a non-speaking participant. The Panel will hear the complainant first. It may hear any other witnesses and the respondent in whatever order it determines. The Panel may re-interview a party if it determines it necessary for clarification.

g. The Panel will explain its process to each party and give each party an opportunity to make brief opening and closing statements. The Panel will devote the remainder of the time to asking questions to clarify the written materials, witness testimony or any other relevant issues it elects to address.

h. The Panel will reach its decision based on a preponderance of the evidence. This is a qualitative not a quantitative standard and means: "whether or not it is more likely than not that a violation of the sexual harassment policy occurred."

i. The Panel will keep official minutes of the hearing and provide a written summary of its deliberations. The official minutes and summary are available to both parties. Generally, the minutes will name witnesses interviewed in the hearing and the deliberation's summary will reflect the materials considered. If either jeopardizes the safety of anyone, names will be removed from the copies given the parties. The personal notes of Panel members shall not be available and will be destroyed at the end of the process.

j. In deliberations, the Grievance Review Panel shall attempt to reach a consensus. If consensus cannot be reached, a vote shall be taken. All decisions of the Panel shall be made by a majority. When the Panel is not unanimous in its findings or sanctions, the deliberation's summary shall record both majority and minority opinions. The summary shall be signed by all members of the Panel. In the summary there will be no recording of the negative or affirmative votes of any individual members of the Panel.

k. No later than two weeks after the hearing concludes, the Panel shall send to the complainant and to the respondent a copy of the minutes of the hearing and the summary of the deliberations. The deliberation's summary will note the sanction(s) to be imposed, if any. The minutes and summary shall also be sent to the Dean of the campus, the Provost, the President and the College's Counsel.

6. Formal Sanctions

When the finding is that a sexual harassment violation has occurred, sanctions shall be imposed upon the offender. If there are previous incidents on file in the Dean's office involving the offender, those may be shared with the Panel after their finding has been reached, but before sanctions are imposed.

Possible sanctions upon faculty, administration and staff may include:

- Oral warning

- Letter of warning or reprimand, and a copy of the grievance placed in the personnel file of the offender

- Prohibition to participate in grading, recommendations, reappointment, and promotion decisions or other evaluations concerning the complainant

- Denial of access to College-Institute resources, such as travel/research funds or merit or cost of living salary increases for a specific period

- Suspension without pay for a specific period

- Dismissal from the College-Institute in accordance with the established procedures

Possible sanctions upon students may include:

- Oral warning

- Letter of warning or reprimand, and a copy placed in the student's file

- Probation

- Forced leave of absence

- Suspension for a defined period of time

- Dismissal from the College-Institute

When any of the last four sanctions are recommended by the Grievance Panel, it will be imposed through the Student Tenure Committee, without its further investigation of the allegations or findings. The Panel will provide information adequate to substantiate its findings and recommendations to the Student Tenure Committee.

II. Appeals Procedures

Either party to the complaint may appeal the decision of the Grievance Review Panel. Only the respondent may appeal the sanctions. Appeals must be filed in writing as here designated, regardless of the provisions under the Student Tenure Review, within seven days of receipt of the decision.

a. If the accused is a student or faculty member, the appeal shall be considered by the Provost.
b. If the accused is a member of the staff or the administration, the appeal shall be considered by the Vice President for Administration.
c. Appeals will be considered only when:
    1. new evidence which was not reasonably available at the time of the formal investigation becomes available which could have substantially altered the outcome or
    2. when an allegation of substantial procedural error is made which could have substantially altered the outcome.

The appeal authority shall have the power to affirm, reverse or modify the decision and/or the sanction imposed. The appeal authority will provide a ruling generally within ten (10) working days from receipt of the appeal. Written notice of the ruling shall be sent to both parties, to the Grievance Review Panel, to the campus Dean, to the President and the College's Counsel. The notice shall include a statement of the reason for the decision.

The President of the College-Institute shall have the authority to make final decisions in all appeals procedures. In cases involving the President, the Chair of the Board of Governors is such authority.

III. Record and Monitoring

The record of all formal grievance procedures and any appeals shall be placed in locked files in the offices of the President and the Director of Human Resources. All other copies will be destroyed except a notation of the file's existence will be kept in the Dean's office of the campus where the complainant and respondent are located. The record will include the written complaint and response, a copy of the policies and procedures in place at the time of the event, the minutes of the proceedings and the statement of finding and deliberations summary and any sanction(s). Access to the record will only be by order of legal process or at the discretion of the President and/or Human Resources Director.

Except as otherwise prohibited by law, (1) requests for access by a certifying or licensing body or Jewish professional association responsible for either party will be given substantial deference and generally be permitted; and (2) if there is a finding that sexual harassment has occurred, the Provost shall report the finding to the Placement Director of the Jewish professional association responsible for the offender.

July 9, 2003

ACKNOWLEDGMENT

I acknowledge that I have read the above College-Institute's Sexual Harassment Policy and Procedures. I agree to abide by it and understand that if the College-Institute finds that I have violated it, I will be subject to discipline up to and including immediate termination of my employee or student status. If an employee, I understand that nothing in this statement modifies the employment-at-will status between me and the College-Institute.

_____
Name (PLEASE PRINT)

_____
Signature

_____
Date