Hollins University Harassment Policy
# Hollins University Harassment Policy

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1. INTRODUCTION

Hollins University’s primary concern is the community’s safety and ability to participate equally in educational and employment opportunities. Therefore, the university prohibits any type of harassing conduct within or connected to the institution.

Within the context of its mission statement, Hollins University strives to recognize human dignity, and is committed to providing equal educational and employment opportunities to all persons, regardless of sex (including gender identity and sexual misconduct), race, color, ethnic origin, nationality, disability, genetic information, sexual orientation, veteran status, marital status, age, and political and religious beliefs.

Unwelcome conduct is unlawful, and unfairly interferes with the opportunity for all persons to have a safe and productive educational and employment environment. Hollins University is committed to taking all reasonable steps to eliminate harassment, prevent its recurrence, and address its effects in a prompt, equitable, and effective manner, and to discipline where appropriate, under the applicable university disciplinary procedures, those who violate this policy. Hollins believes that a person is entitled to say “no” to unwanted and offensive conduct without the fear of reprisal or retribution from any person.

Hollins University is committed to the principles of academic freedom, and believes that free inquiry, critical thinking, vigorous discussion, debate, and free expression are integral parts of the university community. The educational setting presents unique issues because academic freedom promotes the expression of ideas, even where the ideas may be perceived to be offensive. The educational process relies upon the free exchange of ideas, and this policy shall not be interpreted to otherwise restrict academic freedom. This academic freedom, however, should not be used to create a hostile environment.

It is the goal of Hollins University that, when possible, individuals have a responsibility to resolve conflicts between or among themselves. Hollins will strive to create an environment that promotes mature discussion and resolution of issues, and expects that the members of the Hollins community will strive to do the same. All members of the campus community should work to understand that what is perceived as unwelcome conduct by one individual may not be similarly perceived by another where differences of attitude, beliefs, experiences, and/or culture apply. If and when, unwelcome conduct is believed to have occurred, the following internal policy, process, procedures, people, education, and training are in place to report and investigate complaints; provide prompt, equitable, and remedial action to resolve complaints; and provide on- and off-campus assistance and resources to support complainants and respondents.

2. SCOPE OF POLICY

People Impacted

This policy applies to all members of the university community, including administration, faculty, staff, students, anyone who resides on campus, and third parties, regardless of sexual orientation or gender identity. The policy also applies to members of the Hollins community attending off-campus events, trips, programs, and activities sponsored by Hollins University, as well as Hollins’ study-abroad programs. Furthermore, this policy applies to third parties who visit or do business on campus, including contractors.

Harassment can occur between peers (ex. co-students or coworkers), as well as between persons in relationships of unequal power (ex. faculty and students). The potential for creating an atmosphere of fear and intimidation is greater in relationships where such inequalities of power exist.

Harassment and Hostile Environment Definitions

Harassment, as covered by this policy, is any conduct directed toward an individual or group that is unwelcome, unacceptable, and/or offensive; that is based on the protected classes of sex (including gender identity and sexual
misconduct), race, color, ethnic origin, nationality, disability, genetic information, sexual orientation, veteran status, marital status, age, and/or political and/or religious beliefs; and that is pervasive and adversely affects participation in employment, education, or campus life; and/or creates a hostile environment. Harassment can be of a physical, written, verbal, or nonverbal nature. Additionally, harassment can occur regardless of intent.

A hostile environment is created when repeated, severe, pervasive, or persistent harassment interferes with an individual’s ability to learn, work, or otherwise participate in university life. In the majority of cases, a pattern of incidents is required; casual or sporadic incidents are not enough to show a hostile environment. However, a single incident may be sufficiently severe to create a hostile environment.

The Harassment Grievance Board and harassment grievance officers will handle only harassment complaints as defined in the above two paragraphs. Other forms of harassment, whether defined by law or not, will not be tolerated, and may result in disciplinary action if they should occur. Student complaints arising out of these situations will be handled through the policies and procedures of the appropriate Student Conduct Councils that govern undergraduate and graduate students. Complaints involving employees will be addressed through the university’s employment grievance procedures. Any other alleged policy violations associated with a harassment complaint will be addressed separately.

**Confidentiality Provision**

Confidentiality is a clear expectation throughout the report/complaint filing, investigation, determination, resolution, discipline, and appeals processes. Complete confidentiality can never be promised, as persons with “a need to know” must be involved. Also, the safety of the complainant and others must be taken into consideration.

Documentation related to all complaints filed with the Harassment Grievance Board, including the actual complaint, information about accommodations and protective measures, witness interviews, Harassment Grievance Board officer notes, complaint evidence, investigative reports and summaries, disposition documents, resolution records, disciplinary records, and appeal documents, will be stored in a location with secure access, and will not be part of employment or academic records unless an individual receives discipline. Access to records and other information pertaining to harassment reports/complaints, accommodations and protective measures, investigations, determinations, resolutions, discipline, and appeals will be maintained confidentially to the fullest extent possible by restricting access to such records and other information to those individuals with a legitimate need to know and to those individuals designated or otherwise authorized by Hollins University to review such information.

See the “Policies Governing Confidentiality” section for more information.

### 3. OPTIONS AND RESOURCES WITH HARASSMENT COMPLAINTS

**Options for Immediate and Ongoing Assistance for All Harassment Complaints, Including Dating Violence, Domestic Violence, Sexual Violence, and Stalking**

A list of these resources, as well as rights and options, will be provided in writing to students and employees who report to the university that they are survivors of dating violence, domestic violence, sexual violence, or stalking, whether the alleged offense occurred on or off campus.

**ON-CAMPUS resources** for sexual and non-sexual harassment complaint counseling and support for students, whether or not a survivor chooses to make an official report, or participate in the institutional disciplinary process and/or a criminal process. If the below on-campus resources are used, the services are confidential, and these offices and people are not required to report university-related sexual harassment complaints to the Title IX Coordinator.
Health and Counseling Services
x6444, hcs@hollins.edu, lower level of Turner
Academic year schedule: Mon.-Thurs. 8:00 a.m. – 4:30 p.m., Fri. 8:00 a.m. – 2:00 p.m.
Summer 2020 tentative schedule with limited staff:
   May 26 – June 28 Mon.-Fri. 8:00 a.m. – 12:00 p.m.
   June 29 – Aug. 2 Mon.-Thurs. 8:00 a.m. – 4:30 p.m., Fri. 8:00 a.m. – 2:00 p.m.
   Aug. 3 Regular office hours and staffing will resume
Note: No counseling sessions are available during the summer

They can provide treatment for injuries, prescriptions and products for birth control, information about prevention of sexually transmitted diseases, and other health and counseling services.

University Chaplain – Jenny Call
x6665
calljf@hollins.edu
Chapel

CASA - Coalition Against Sexual Assault (student group)
casa@hollins.edu
Moody Student Center top floor, office 8
Services are only available during the academic year. CASA volunteers can be reached during night office hours Sun.-Thurs. Additional contact information and hours posted outside the office. Members are able to accompany survivors to hospitals and health providers.

OFF-CAMPUS resources for sexual harassment and non-sexual harassment complaint counseling and support for students and employees, whether or not a survivor chooses to make an official report, or participate in the institutional disciplinary process and/or a criminal process. If the below off-campus resources are used, the services are confidential, and these providers are not required to report university-related sexual harassment complaints to the Title IX Coordinator.

HEALTH SERVICES

These hospitals can provide treatment for injuries, preventative treatment for sexually transmitted diseases, and other health services. Survivors have the option of seeking medical treatment in order to preserve evidence should they decide to report the incident to the appropriate law enforcement agency for possible prosecution of the offender(s) and/or to obtain a protective order. The providers below can provide rape kits, and have sexual assault nurse examiners (SANEs) on staff.

Carillion Roanoke Memorial Hospital
540-981-7000
www.carilionclinic.org/hospitals/carilion-roanoke-memorial-hospital

LewisGale Medical Center (hospital)
540-776-4000
www.lewisgale.com/locations/lewisgale-medical-center

COUNSELING / MENTAL HEALTH SERVICES

Blue Ridge Behavioral Healthcare
540-343-3007 (general number) or 540-981-9351 (crisis services)
www.brbh.org

Family Service of Roanoke Valley
540-563-5316
www.fsrv.org
(This is also the Employee Assistance Program provider. Employees can contact HR for details.)
CONNECT (Carillion Clinic Psychiatry and Behavioral Medicine Dept.)
540-981-8181 or 800-284-8898
www.carilionclinic.org/connect

RESPOND (LewisGale Center for Behavioral Health)
540-776-1100 or 800-541-9992
www.lewisgale.com/service/respond-assessment-and-referral-system

SURVIVOR ADVOCACY – immediate and ongoing

Sexual Assault Response and Awareness (SARA) - Roanoke
540-981-9352
www.sararoanoke.org
Staff and volunteers may be able to accompany survivors to hospitals and health providers.

Virginia Sexual and Domestic Violence Action Alliance
Phone: 800-838-8238, Family Violence and Sexual Assault Hotline
Phone: 866-356-6998, LGBTQ Partner Abuse and Sexual Assault Helpline

OTHER RESOURCES

Student Assistance Program
800-633-3353
Username: “hu1842”
Password: “guest”

Disability Services (for students)
Dean of Academic Success Michael Gettings
x6414
mgettings@hollins.edu

Financial Aid (for students)
x6332
sfa@hollins.edu

Visa and Immigration Assistance through the International Programs Office (for students)
x6089
abroad@hollins.edu

Visa and Immigration Assistance through USCIS (for students and employees)
800-375-5283,
www.uscis.gov/about-us/contact-us

SECURITY, LAW ENFORCEMENT, and LEGAL ASSISTANCE

Roanoke County Police Department
540-562-3265 for non-emergencies, 911 for emergencies
Immediate and Interim Measures for All Harassment Complaints, Including Dating Violence, Domestic Violence, Sexual Violence, and Stalking

For the safety and well-being of a student complainant of any form of harassment, if requested and reasonably available, the university may take immediate and interim measures, including, but not limited to, to allow students to move campus residences (temporarily or permanently), change university work schedules, alter academic schedules, withdraw from or retake a class without penalty, and access academic support (ex. tutoring). Other immediate and interim measures the university may take include, but are not limited to, providing escort services, issuing a no-contact order or no-trespass notice against the complaint respondent, and changing the campus living arrangements, university work schedule, and course schedule of the respondent.

For the safety and well-being of an employee complainant of any form of harassment, if requested and reasonably available, the university may take immediate and interim measures including, but not limited to, changing her/his work schedule and assigning an interim or new supervisor. Other immediate and interim measures the university may take include, but are not limited to, issuing a no-contact order or no-trespass notice against the respondent.

Complainants may contact the Title IX Coordinator to request the aforementioned accommodations and protective measures.

4. HARASSMENT GRIEVANCE OFFICERS AND HARASSMENT GRIEVANCE BOARD

Harassment grievance officers have responsibility for receiving, investigating, and helping resolve harassment complaints. The harassment grievance officers constitute the Harassment Grievance Board, and the board members will elect a chair. Harassment grievance officers are appointed for a one (1), two (2), or three (3) year term by the President, and may include members from the tenured and untenured faculty, administration, and staff. The Title IX Coordinator is also a Harassment Grievance Board officer. Each year, the harassment grievance officers are identified through student and employee orientations and trainings and through
communications with the campus community. The list of Harassment Grievance Board officers is available on my.hollins.edu, from the Human Resources Office in Botetourt Hall, and on various bulletin boards on campus.

The Harassment Grievance Board officers are:

**LeeRay Costa**  
Professor, Anthropology and Women's Studies  
x6254, lcosta@hollins.edu

**Brad Oechslin**  
Manager, Instructional Technology  
x6020, boechslin@hollins.edu

**Alicia Godzwa**  
Director, Human Resources  
Title IX Coordinator  
x6070, agodzwa@hollins.edu

**Rebecca Seipp (Chair)**  
Outreach/Liaison Librarian  
x6328, seipprl@hollins.edu

**Rick Michalski**  
Associate Professor, Psychology  
x6586, rmichalski@hollins.edu

5. TITLE IX COORDINATOR

Title IX of the Education Amendments of 1972 is a federal civil rights law that prohibits discrimination on the basis of sex in federally-funded educational programs and activities. Title IX protects students, employees, applicants for admission and employment, and other persons from all forms of sex discrimination, including sexual orientation and gender identity. All public and private colleges and universities receiving any federal financial assistance must comply with Title IX.

The university’s Title IX Coordinator, Alicia Godzwa, is also the Director of Human Resources. She may be reached at 540-362-6070; agodzwa@hollins.edu; or Hollins University, Human Resources Office, Box 9716, Roanoke, VA 24020. Her office is located on the main floor of Botetourt Hall, office 4.

The Title IX Coordinator has responsibility for the Harassment Policy and oversight responsibility for policies, training, resources, and campus climate surveys related to sexual misconduct. All complaints involving sex (including gender identity and sexual misconduct) and sexual orientation are ultimately reported to and the responsibility of the Title IX Coordinator. The Vice President for Finance and Administration oversees all complaints involving sexual harassment where the Title IX Coordinator is the respondent.

The Title IX Coordinator’s responsibilities include overseeing the school’s response to Title IX reports and complaints, and identifying and addressing any patterns or systemic problems revealed by such reports and complaints. Additionally, the Title IX Coordinator is responsible for evaluating complainant requests for confidentiality in the context of the school’s responsibility to provide a safe and nondiscriminatory environment.

The Title IX Coordinator also has responsibility for providing training to students, faculty, and staff on Title IX issues; conducting Title IX investigations, including investigating facts relevant to a complaint; assisting with determining appropriate sanctions against the respondent; determining remedies for the complainant; determining appropriate interim measures for a complainant upon learning of a report or complaint of sexual violence; and ensuring that appropriate policies and procedures are in place for working with local law enforcement and coordinating services with local victim/survivor advocacy organizations and service providers, including rape crisis centers.

The Title IX Coordinator or her/his designee is also available to meet with complainants and respondents as needed. See the following sections for additional details regarding the Title IX Coordinator’s duties.

Questions regarding Title IX may be referred to the Title IX Coordinator or the Department of Education Office for Civil Rights.
6. DEFINITIONS

The following conduct is prohibited by this policy:

Harassment
As defined earlier in the policy, harassment, is any conduct directed toward an individual or group that is unwelcome, unacceptable, and/or offensive; that is based on the protected classes of sex (including gender identity and sexual misconduct), race, color, ethnic origin, nationality, disability, genetic information, sexual orientation, veteran status, marital status, age, and/or political and/or religious beliefs; and that is pervasive and adversely affects participation in employment, education, or campus life; and/or creates a hostile environment. Harassment can be of a physical, written, verbal, or nonverbal nature. Additionally, harassment can occur regardless of intent.

Sexual Harassment
Sexual harassment is unwelcome, unacceptable, and/or offensive physical, written, verbal, or nonverbal conduct of a sexual nature. This includes sexual violence.

Hostile Environment
As defined earlier in the policy, a hostile environment is created when repeated, severe, pervasive, or persistent harassment interferes with an individual’s ability to learn, work, or otherwise participate in university life. In the majority of cases, a pattern of incidents is required; casual or sporadic incidents are not enough to show a hostile environment. However, a single incident may be sufficiently severe to create a hostile environment.

Hostile Environment Caused by Sexual Harassment
A hostile environment caused by sexual harassment is created when repeated, severe, pervasive, or persistent unwelcome, unacceptable, and/or offensive physical, written, verbal, or nonverbal conduct of a sexual nature interferes with an individual’s ability to learn, work, or otherwise participate in university life. In the majority of cases, a pattern of incidents is required; casual or sporadic incidents are not enough to show a hostile environment. However, a single incident may be sufficiently severe to create a hostile environment.

Sexual Violence
Sexual violence refers to physical sexual acts perpetrated against a person’s will or where a person is incapable of giving consent. This includes rape, sexual assault, sexual battery, sexual abuse, and sexual coercion.

Sexual Assault
Sexual assault, under Virginia state law, includes rape, forcible sodomy, inanimate or animate object sexual penetration, marital sexual assault, aggravated sexual battery, and sexual battery. Sexual assault, under federal law, includes rape, fondling, incest, and statutory rape. Sexual assault also includes non-consensual sexual contact and non-consensual sexual intercourse. Non-consensual sexual contact occurs when a party does not consent to, under Virginia state law, sexual intercourse or physical contact in an act of apparent sexual stimulation or gratification with her/his clothed or unclothed genitals, pubic area, buttocks or, if such be female, breast. Non-consensual sexual intercourse occurs when a party does not consent to the act, and under Virginia state law, such act is accomplished (i) against the complaining witness's will, by force, threat, or intimidation of or against the complaining witness or another person; or (ii) through the use of the complaining witness's mental incapacity or physical helplessness; or (iii) with a child under age 13 as the victim.

Sexual Exploitation
Sexual exploitation is one party’s illegal use of an incapacitated person for sexual purposes for her/his or another’s profit or advantage.

Domestic Violence
An act against a family or household member that involves violence, force, or threats, and results in physical injury, or places the family or household member in fear of injury or harm.
Dating Violence
An act against a person, with whom the perpetrator is involved romantically or intimately, that involves violence, force, or threats, and results in physical injury, or places the person in fear of injury or harm. The existence of such a relationship will be determined by the length and type of relationship and frequency of interactions.

Stalking
Conduct, on more than one occasion, directed at someone that places, or has the intent to place, a person in reasonable fear of death, criminal sexual assault, or bodily injury to that person or her or his family or household member, or to suffer substantial emotional distress.

Retaliation
No one may discharge, suspend, expel, threaten, intimidate, coerce, or otherwise discriminate against a complainant or witness who, in good faith, complains or provides information to, or otherwise cooperates with, a harassment grievance officer or the Harassment Grievance Board; attempts to assert any right protected by state or federal law; or assist any person in asserting such right. No one may discharge, suspend, expel, threaten, intimidate, coerce, or otherwise discriminate against any person for exercising her/his responsibilities, in good faith, under this policy.

Intimidation
No one may scare a complainant or witness who, in good faith, complains or provides information to, or otherwise cooperates with, the Harassment Grievance Board; attempts to assert any right protected by state or federal law; or assists any person in asserting such right. Intimidation includes, but is not limited to, use of force, threat of use of force, reprisal, or threat of reprisal.

Note these additional definitions in relation to sexual activity:

Consent
With regard to sexual activity, consent is a voluntary agreement to engage in such activity. Someone who is incapacitated cannot consent; past consent does not imply future consent; silence or an absence of resistance does not necessarily imply consent; consent to engage in sexual activity with one person does not imply consent to engage in sexual activity with another; consent can be withdrawn at any time; and coercion, force, threat, or intimidation of either party is not consent, and invalidates prior consent. Consent is not given if the act is accomplished through the use of a person’s mental incapacity or physical helplessness. Consent obtained from a person who is under the influence of alcohol or other drugs may not be considered informed consent. Ideally, a person’s consent should be informed, freely given, and mutually indicate permission through words and actions unmistakable in meaning.

Incapacitation
Incapacitation can result from the use of drugs or alcohol, when a person is asleep or unconscious, or because of an intellectual or other disability that prevents a person from having the ability to give consent to sexual activity.

7. REPORTING POLICIES AND PROTOCOLS

Filing a Harassment Complaint

Complaints about sexual harassment should be filed with a responsible employee or student representative as close to the alleged incident as possible, but in all circumstances, a complaint must be filed within one hundred eighty (180) calendar days of the alleged harassment.

Complaints about all other forms of harassment should be filed with a Harassment Grievance Board officer as close to the alleged incident as possible, but in all circumstances, a complaint must be filed within one hundred eighty (180) calendar days of the alleged harassment.
**Responsible employees** include, but are not limited to, Harassment Grievance Board officers, the President, vice presidents, deans, administrative directors, faculty, athletic coaches and trainers, club advisors, and security officers. **Responsible employee student representatives** include resident assistants (RAs), student success leaders (SSLs), graduate assistants, teaching fellows, and foreign language teaching assistants. Student representatives have been trained to accept complaints, and have reporting responsibility. However, due to their unique positions as students, they do not function as agents of the university.

More time to file a complaint may be offered to the potential complainant if extenuating circumstances exist. An extension of time to file a complaint should be sent in writing to the Harassment Grievance Board Chair. The chair will advise the potential complainant in writing within five (5) working days if an extension of time to file a complaint has been granted.

Written complaints are preferred, and should generally include the following information: name(s) of the respondent, details of what allegedly occurred, when the harassment allegedly occurred, where the harassment allegedly occurred, why the alleged harassment occurred if known, witnesses to the alleged harassment, response(s) to the alleged harassment, and action(s) required for resolution.

With complaints involving alleged criminal conduct (for example, issues of sexual violence), the complainant is encouraged, but not required, to report the incident to local, state, and/or federal law enforcement agencies. The complainant may contact the university Security Department for assistance notifying law enforcement agencies about alleged criminal conduct.

**Formal Reporting Options for Sexual Harassment Complaints**

For sexual harassment complaints, the complainant may file an institutional complaint. For sexual harassment complaints involving violence, the complainant may also file a criminal complaint with the appropriate law enforcement agency, and the complainant may contact the university Security Department for assistance notifying the appropriate law enforcement agency.

**To file an institutional complaint**, the complainant may contact a responsible employee, including the Title IX Coordinator, or a student representative. Sexual harassment complaints, whether written or oral, that are reported to responsible employees and student representatives must be reported to the Title IX Coordinator as soon as practicable after addressing the immediate needs of the survivor. Responsible employees and student representatives who receive complaints about sexual violence must also notify the Security Department (via phone at 540-362-6419) for Clery Act reporting compliance as soon as practicable after addressing the immediate needs of the survivor. The Title IX Coordinator will then investigate the complaint herself/himself, with one or more Harassment Grievance Board officers, or may assign the complaint to two or more harassment grievance officers.

**To file a criminal complaint**, the complainant may contact the Roanoke County Police Department or Commonwealth Attorney. The complainant may contact the university Security Department for assistance notifying these law enforcement agencies.

**Roanoke County Police Department**
540-562-3265 for non-emergencies, 911 for emergencies

**Commonwealth Attorney and Public Defender - Roanoke County**
540-387-6174

If a criminal complaint is filed, the criminal investigation will run parallel to or independent of the university investigation, depending whether or not an institutional complaint was filed.
Formal Reporting Options for All Other, Non-Sexual Harassment Complaints

For all other harassment complaints, the complainant may file an institutional complaint. For non-sexual harassment complaints involving violence or stalking, the complainant may also file a criminal complaint with the appropriate law enforcement agency, and the complainant may contact the university Security Department for assistance notifying the appropriate law enforcement agency.

To file an institutional complaint, the complainant may contact a responsible employee, including the Title IX Coordinator, or a student representative. The Title IX Coordinator will then investigate the complaint herself/himself, with one or more Harassment Grievance Board officers, or may assign the complaint to two or more harassment grievance officers.

To file a criminal complaint, the complainant may contact the Roanoke County Police Department or Commonwealth Attorney. The complainant may contact the university Security Department for assistance notifying these law enforcement agencies.

Roanoke County Police Department
540-562-3265 for non-emergencies, 911 for emergencies

Commonwealth Attorney and Public Defender - Roanoke County
540-387-6174

If a criminal complaint is filed, the criminal investigation will run parallel to or independent of the university investigation, depending whether or not an institutional complaint was filed.

Alternatives to Reporting Sexual Harassment Complaints

A student may contact Health and Counseling Services or the University Chaplain to have a sexual harassment complaint deemed, in most cases, a privileged and confidential disclosure. A student may contact CASA (Coalition Against Sexual Assault) or an off-campus resource to have a sexual harassment complaint deemed a privileged and confidential disclosure, and an employee may contact an off-campus resource to have a sexual harassment complaint deemed a privileged and confidential disclosure.

Alternatives to Reporting All Other, Non-Sexual Harassment Complaints

All other, non-sexual harassment complaints from students and employees are considered privileged and confidential disclosures unless the complainant contacts a Harassment Grievance Board officer.

Policies Governing Confidentiality

As stated previously, a student may contact Health and Counseling Services or the University Chaplain to have a sexual harassment complaint deemed, in most cases, a privileged and confidential disclosure. The exceptions to this confidentiality are situations in which there are concerns about the student’s or others’ safety, or the victim or survivor is a minor. In such situations, incident information pertinent to the student’s, others’, or the minor’s safety will be disclosed to university administrators responsible for helping keep the student, campus community, or minor safe; all other information will remain confidential.

As also stated previously, a student may contact CASA (Coalition Against Sexual Assault) or an off-campus resource to have a sexual harassment complaint deemed a privileged and confidential disclosure, and an employee may contact an off-campus resource to have a sexual harassment complaint deemed a privileged and confidential disclosure. In these disclosures, all information is kept confidential.
Students and employees who tell a responsible employee or a student representative about a sexual harassment situation should understand that the responsible employee or student representative must report the incident, including personally identifying details, to the Title IX Coordinator as a requirement of this policy and state and federal laws. Responsible employees and student representatives have been trained that if a student or employee contacts them with a sexual harassment incident, they are asked to explain their reporting obligations before the student or employee reveals any information about the incident to them.

As also stated previously, all other, non-sexual harassment complaints from students and employees are considered privileged and confidential disclosures unless the complainant contacts a Harassment Grievance Board officer.

There are times in sexual or non-sexual harassment complaints when the university may not be able to honor a student’s or employee’s request that her/his name not be disclosed to the respondent, or that no investigatory or disciplinary action be taken. These times include, but are not limited to, if the respondent has been involved in similar incidents; there is a risk to the safety of the student, employee, others, or the campus community; or the victim or survivor is a minor. The Title IX Coordinator is responsible for evaluating such requests for confidentiality or no action.

*University’s Reporting Obligations Under the Clery Act*

The “Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act” requires colleges and universities to report annually information regarding their campus security policies and campus crime statistics. This is done through the Annual Security Report.

Hollins University has identified non-security department campus security authorities to whom crimes may be reported by victims, witnesses, other third parties, or offenders confidentially. A list of identified campus security authorities can be found in the university Student Handbook and posted on the university Security website. Reports taken by non-security department campus security authorities will be forwarded to the Chief of Security for review, inclusion in the annual disclosure of crime statistics, and for timely warning purposes.

The university will issue a timely warning when a crime is reported to, or brought to the attention of, the Security Department or other campus security authorities, and that crime represents a serious or ongoing threat to the safety of members of the university community. Information for timely warnings may also come from law enforcement authorities. Every attempt will be made to issue the warning as soon as possible after the incident is reported to the university; however, the release is subject to the availability of accurate facts concerning the incident. Warnings are created by the combined efforts of the university President, the Vice President for Finance and Administration, and the Director of Public Relations, in conjunction with the Security Department. Crimes for which a timely warning is appropriate include, but are not limited to: murder/non-negligent manslaughter, manslaughter, forcible sex offenses, non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, arson, domestic violence, dating violence, stalking, and hate crimes in the additional categories of larceny/theft, simple assault, intimidation, and destruction/damage/vandalism of property.

*Process for Third-Party and Anonymous Reporting*

Third-party and anonymous reports and complaints received by responsible employees, student representatives, and Harassment Grievance Board officers, as described previously, will be treated as institutional complaints.

*Prohibition Against Retaliation*

Prohibition of retaliation is a clear expectation throughout the report/complaint filing, investigation, determination, resolution, discipline, and appeals processes. Retaliation against a complainant (including a third-party), witness, or any other person exercising her/his rights or responsibilities under this policy is prohibited. Anyone found to have violated the anti-retaliation provision of this policy will likely be disciplined.
Times When Amnesty Will Be Granted for Students

Per the “Special Provisions” section of the university Student Handbook, “In a community, students are encouraged to help other members of the community who are in need; in other words, to be good Samaritans. When a student has assisted an intoxicated student in procuring the services of university Security and/or professional medical assistance at Health and Counseling Services or another health care facility, neither the intoxicated student nor the individual(s) who assist(s) them will be subject to formal action through the university conduct process for being intoxicated, or having provided that person alcohol. This applies only to first-time isolated incidents, and does not excuse or protect those who flagrantly or repeatedly violate university alcohol policies. A student who reports, or is the survivor of, a violent physical assault or sexual assault, but who may have been in violation of university policies on alcohol or other drugs at the time of the assault, will not be charged with a conduct violation, in the interest of encouraging survivors of violence to come forward and take action.”

8. COMPLAINTS INVOLVING AN ALLEGED ACT OF SEXUAL VIOLENCE

If the Title IX Coordinator receives a report about an alleged act of sexual violence, she/he will promptly report the information, including any personally identifiable information, to the university’s Title IX Review Committee. The Review Committee is comprised of the Title IX Coordinator, the Chief of Campus Security, and the Assistant Dean of Students and Director of Housing & Residence Life, or their designees. The Review Committee will meet within 72 hours of receiving information about the alleged sexual violence to review the information, and will meet again as necessary as new information becomes available.

The Review Committee may obtain law enforcement records, criminal history record information, health records, available institutional conduct or personnel records, and known facts and circumstances of the information reported, or information or evidence known to the institution or to law enforcement. The Review Committee shall conduct its review in compliance with federal privacy law.

If, based on consideration of all factors, the Review Committee, or if the committee cannot reach a consensus, the representative of Campus Security on the Review Committee, determines that the disclosure of the information, including personally identifiable information, is necessary to protect the health or safety of the survivor or other individuals, the representative of Campus Security on the Review Committee shall immediately disclose such information to the law enforcement agency that would be responsible for investigating the alleged act of sexual violence. Such disclosure shall be for the purposes of investigation and other actions by law enforcement. Upon such disclosure, the Title IX Coordinator or her/his designee shall notify the survivor that such disclosure is being made. The provisions of this procedure shall not apply if the law enforcement agency responsible for investigating the alleged act of sexual violence is located outside the United States.

In cases in which the alleged act of sexual violence would constitute a felony violation, the representative of Campus Security on the Review Committee shall inform the other members of the Review Committee, and shall within 24 hours, consult with the Commonwealth Attorney or other prosecutor responsible for prosecuting the alleged act of sexual violence, and provide to her/him the information received by the Review Committee without disclosing personally identifiable information, unless such information needs to be disclosed to protect the health or safety of the survivor or other individuals. In addition, if such consultation does not occur, and any other member of the Review Committee individually concludes that the alleged act of sexual violence would constitute a felony violation, that member shall within 24 hours consult with the Commonwealth Attorney or other prosecutor responsible for prosecuting the alleged act of sexual violence, and provide to her/him the information received by the Review Committee without disclosing personally identifiable information, unless such information needs to be disclosed to protect the health or safety of the survivor or other individuals.

At the conclusion of the review, the Title IX Coordinator and the Campus Security representative shall each retain (i) the authority to proceed with any further investigation or adjudication allowed under state or federal law, and
(ii) independent records of the Review Committee’s considerations, which shall be maintained under applicable state and federal law.

One of the committee members will ensure the survivor is informed of (i) the available law enforcement options for investigation and prosecution; (ii) the importance of collection and preservation of evidence; (iii) the available options for a protective order; (iv) the available campus options for investigation and adjudication under the institution's policies; (v) the victim's rights to participate or decline to participate in any investigation to the extent permitted under state or federal law; (vi) the applicable federal or state confidentiality provisions that govern information provided by a victim; (vii) the available on-campus resources and any unaffiliated community resources, including sexual assault crisis centers, domestic violence crisis centers, or other victim support services; and (viii) the importance of seeking appropriate medical attention.

9. INVESTIGATION PROCEDURES AND PROTOCOLS

Investigators

Once the Title IX Coordinator receives a harassment complaint, he/she will investigate the complaint herself/himself, with one or more Harassment Grievance Board officers, or may assign the complaint to two or more Harassment Grievance Board officers. In most cases, a minimum of two Harassment Grievance Board officers will conduct the investigation. Additionally, the full board may be involved in complaints that warrant disciplinary action. The Title IX Coordinator will have oversight responsibility with all sexual harassment complaints. Complaint investigations will be conducted by Harassment Grievance Board officers who receive annual training on issues related to dating violence, domestic violence, sexual violence, and stalking and annual training on how to conduct an investigation that protects the safety of survivors and promotes accountability. It is the intent of the university that its investigative procedures be prompt, fair, and impartial.

Process

The complainant and the respondent will be advised of the name(s) of the harassment grievance officer(s) who will be investigating the complaint.

The party accused of harassment will be notified within three (3) working days of receipt of the complaint, unless such notification is impossible through no fault of the university, in which the notification will be provided as soon as possible under the specific circumstances, and the specific charges will be clearly stated in writing. If additional charges develop during the investigation, the respondent will be notified in writing immediately.

The Title IX Coordinator and/or harassment grievance officer(s) will interview the complainant and witnesses, and will examine available evidence and documentation.

The Title IX Coordinator and/or harassment grievance officer(s) will interview the respondent, informing the individual(s) of the evidence and documentation brought against them, and will request that the respondent provide witnesses, evidence, and documentation that are pertinent to the investigation.

The Title IX Coordinator and/or harassment grievance officer(s) may interview any other individual who has information or may potentially impact the investigation and resolution processes.

Evidence

The Title IX Coordinator and/or harassment grievance officer(s) will ask the complainant, respondent, and witness(es) that original evidence and documentation be submitted to her/him/them, or if electronic, the original forwarded, or a copy be made.
The complainant and/or respondent may request the opportunity to examine available evidence and documentation. The Title IX Coordinator and/or harassment grievance officer(s) will determine what, if any, evidence and documentation can be shared between the complainant and/or respondent.

In cases of sexual misconduct, evidence about the complainant’s prior sexual conduct with anyone other than the respondent is not admissible. Additionally, evidence of a prior consensual dating or sexual relationship between the parties by itself does not imply consent or preclude a finding of sexual misconduct.

**Timeline**

Reasonable attempts will be made to resolve any complaint in a timely manner. While the goal to complete a complaint investigation is approximately sixty (60) calendar days following receipt of the complaint, complaints will be handled promptly. The complainant and respondent will be contacted regularly about the investigation status, and will also be notified in writing should the case require a protracted investigation and the reason for the delay. Such delays may include, but are not limited to, issues involving the availability of parties to the complaint, availability of the Title IX Coordinator or Harassment Grievance Board officers, and the demands and schedule of the academic session.

**Interim Measures**

Under appropriate circumstances, immediate action to prevent harassment will be taken, and is not limited to the process and procedures provided herein. As appropriate, the complainant and respondent will be notified as soon as practical of such action. See prior section, “Immediate and Interim Measures for All Harassment Complaints, Including Dating Violence, Domestic Violence, Sexual Violence, and Stalking” for more information.

**Support Persons and Advisors**

If the complainant and/or respondent request(s) to bring a support person or advisor to a harassment complaint related meeting, including a disciplinary meeting, the request must be submitted in writing to the Harassment Grievance Board officer(s) investigating the complaint no less than five (5) working days before such meeting. The Harassment Grievance Board officer(s) who receive(s) the request must review it with the Title IX Coordinator and/or Vice President for Finance and Administration. The Title IX Coordinator and/or Vice President for Finance and Administration will advise the investigating harassment grievance officer(s) of the conditions of the role and participation of the support person or advisor at the meeting by three (3) working days before such meeting. Once the harassment grievance officer(s) receive(s) the decision from the Title IX Coordinator and/or Vice President for Finance and Administration, he/she/they will notify the requester by two (2) working days before such meeting.

**Parallel Investigations with Law Enforcement**

Hollins University has a memorandum of understanding (MOU) with Roanoke County (Virginia) Police Department, and may contact them to assist in the investigation of any alleged felony criminal sexual assault in or on campus property or on public property. Hollins also has a mutual aid agreement (MAA) with the Virginia State Police, and may contact them to assist with any alleged felony sexual assault. Hollins will provide these law enforcement agencies with as much information as possible to aid in their investigations, at the request of a complainant, without violating the confidentiality of a complainant who requests such. The exceptions to this confidentiality are situations in which the respondent has been involved in similar incidents; there is a risk to the safety of the complainant, others, or the campus community; or the victim or survivor is a minor.

**University Response When Confidentiality Requested**

There are times when a complainant’s request for confidentiality limits the university’s ability to fully investigate and respond to a particular matter. However, the university may be able to take steps to limit the effects of the alleged harassing behavior and prevent its recurrence without initiating formal action against the alleged
respondent or revealing the identity of the complainant. For example, the university may be able to take the
following actions including, but not limited to: providing increased monitoring, supervision, or security at
locations or activities where the alleged misconduct occurred; providing training and education materials for
students and employees; revising and publicizing the school’s Harassment Policy; and conducting climate surveys
regarding such misconduct.

10. GRIEVANCE/ADJUDICATION PROCEDURES

Complaint Determination

The Harassment Grievance Board officers will use the “preponderance-of-the-evidence” standard in determining
whether harassment has occurred. With the preponderance-of-the-evidence standard, the harassment grievance
officers will determine if it is more likely than not that harassment occurred.

In determining whether the alleged, unwelcome conduct constitutes a violation of this policy, the Harassment
Grievance Board officers will consider the totality of the circumstances, including all relevant information
regarding the nature of the alleged, unwelcome conduct and the context in which the alleged, unwelcome conduct
occurred. Conduct alleged to constitute harassment will be evaluated on a case-by-case basis according to the
objective standards of a reasonable person. A reasonable person is one who is under similar circumstances, and
has similar identities to the complainant.

Resolution with No Discipline

It should be noted that discipline may not be warranted, even if a violation of this policy has occurred, depending
on the totality of circumstances of the complaint.

Resolution procedures, such as mediation, are intended to provide prompt, fair, and impartial resolution of
problems and to preserve the interests of all involved. A complaint may be resolved through oral or written
agreement. However, mediation cannot be used as a form of resolution in complaints of sexual misconduct.

The Title IX Coordinator or Harassment Grievance Board officer(s) will do what is appropriate, fair, and practical
to meet the complainant’s request for resolution, as well as suggest and/or request additional remedies and
accommodations they feel are needed by the complainant. Harassment grievance officers will also suggest to the
Title IX Coordinator any remedies they feel are needed for the campus community as a result of a complaint.

After the completion of the resolution process, a Harassment Grievance Board officer will contact each of the
parties to discuss the results of the investigation and future expectations within five (5) working days after a
determination about the complaint has been made. This communication will be sent to both parties
simultaneously. It will include a written report of the outcome of the investigation, including information about
the rationale for the complaint determination, any disciplinary action, the appeal process, when the outcome
becomes final, and a statement that the university will not require either party to abide by a nondisclosure
agreement, in writing or otherwise, that would prevent the redisclosure of information related to the outcome of
the investigation.

The complainant and respondent will be notified regularly in writing should the case require a protracted
resolution and the reason for the delay. Such delays may include, but are not limited to, issues involving the
availability of parties to the complaint, availability of the Title IX Coordinator or Harassment Grievance Board
officers, and the demands and schedule of the academic session.
Resolution with Discipline

Resolution procedures, such as mediation, are intended to provide prompt, fair, and impartial resolution of problems and to preserve the interests of all involved. A complaint may be resolved through oral or written agreement. However, mediation cannot be used as a form of resolution in complaints of sexual misconduct. The Title IX Coordinator or Harassment Grievance Board officer(s) will do what is appropriate, fair, and practical to meet the complainant’s request for resolution, as well as suggest and/or request additional remedies and accommodations they feel are needed by the complainant. Harassment grievance officers will also suggest to the Title IX Coordinator any remedies they feel are needed for the campus community as a result of a complaint.

After the completion of the resolution process, a Harassment Grievance Board officer will contact each of the parties to discuss the results of the investigation and future expectations within five (5) working days after a determination about the complaint has been made. This communication will be sent to both parties simultaneously. It will include a written report of the outcome of the investigation, including information about the rationale for the complaint determination, any disciplinary action, the appeal process, when the outcome becomes final, and a statement that the university will not require either party to abide by a nondisclosure agreement, in writing or otherwise, that would prevent the redisclosure of information related to the outcome of the investigation.

In the event it is determined that a violation of this policy has occurred, and discipline is warranted, discipline may include, but is not limited to, any of the following:

- Oral reprimand
- Written reprimand
- Employment suspension (with or without pay) or termination
- Academic suspension or expulsion
- Limitations on access to the university’s property or banning from the same

In situations where employee discipline is warranted, the appropriate vice president will determine the final discipline. The Harassment Grievance Board officers will provide information gathered as part of the investigation to the appropriate vice president for her/his review in determining discipline. The harassment grievance officers will meet with the appropriate vice president upon her/his request to review the submitted information and the harassment grievance officers’ determination of the complaint.

In situations where student discipline is warranted, the Assistant Dean of Students and Director of Housing & Residence Life (who also serves as the Judicial Coordinator) and/or Vice President for Student Affairs and Dean of Students will determine the final discipline. The Harassment Grievance Board officers will provide information gathered as part of the investigation to the Assistant Dean of Students and/or Vice President for Student Affairs for her/his review in determining discipline. The harassment grievance officers will meet with the Assistant Dean of Students and/or Vice President for Student Affairs upon her/his/their request to review the submitted information and the harassment grievance officers’ determination of the complaint.

The appropriate vice president, Assistant Dean of Students, or Vice President for Student Affairs will notify the individual(s) who it was determined violated the policy of the discipline to be imposed. Disciplinary action will normally occur within ten (10) working days after the harassment grievance officers have determined that a violation of the policy has occurred, and discipline is warranted. A determination that an individual has violated this policy and the disciplinary action will be placed in the individual’s employment and/or judicial file. Discipline may also include legal action.

The complainant and respondent will be notified regularly in writing should the case require a protracted resolution and the reason for the delay. Such delays may include, but are not limited to, issues involving the availability of parties to the complaint, availability of the Title IX Coordinator or Harassment Grievance Board officers, and the demands and schedule of the academic session.
Transcript Notation for Sexual Violence

In situations where a student is suspended for, is permanently dismissed for, or withdraws from the institution while under investigation, for an offense involving sexual violence, a notation will be made on the student’s transcript.

Conflicts of Interest

If the complainant and/or respondent feel that there is a potential conflict of interest with a harassment complaint investigator or disciplinarian, she/he/they should send a written notice of the concern and rationale for the concern to the Vice President for Finance and Administration within two (2) working days of such concern being raised. The Vice President for Finance and Administration will then respond to the concern within two (2) working days. If the conflict of interest is with the Vice President for Finance and Administration, the written notice of concern and rationale for the concern should be sent to the President within two (2) working days of such concern being raised. The President will then respond to the concern within two (2) working days.

Appeal Process

The complainant or respondent involved in a harassment complaint procedure may appeal the complaint determination or imposed discipline based upon perceived procedural error; where previously unavailable, relevant evidence could significantly impact the outcome of a complaint; or where it is felt the discipline is substantially disproportionate to the complaint findings. The appeal must be made within ten (10) working days of the date the notice of the determination made by the Harassment Grievance Board, officers, or Title IX Coordinator is issued. The appeal must be made in writing to the Vice President for Academic Affairs or the President, and must state in detail the reasons upon which the appeal is based.

If the appeal involves a student or staff member, the Vice President for Academic Affairs will appoint a three-member appeal panel consisting of staff and/or faculty uninvolved with the complaint to investigate the appeal. The Vice President for Academic Affairs will designate one member of the panel as the convener. If the appeal involves a faculty member, the Vice President for Academic Affairs will notify the Faculty Review Board, and three members of the board will constitute an appeal panel to investigate the appeal.

The Vice President for Academic Affairs will forward to each appeal panel member copies of all investigative materials, including recommendations from the Harassment Grievance Board, officers, or Title IX Coordinator. Members of the appeal panel may seek additional information or advice, and will make a decision within thirty (30) calendar days from the date they receive the investigative materials.

The appeal panel shall make a recommendation either for or against reconsideration of the complaint determination or imposed discipline noted in the appeal. The recommendation will be reported to the Vice President for Academic Affairs within three (3) working days after a decision is reached, and to both parties involved in the complaint within five (5) working days after a decision is reached. This communication will be sent to both parties simultaneously. It will include information about what specific action(s) and/or procedure(s) should be reconsidered, when the appeal decision becomes final, and a statement that the university will not require either party to abide by a nondisclosure agreement, in writing or otherwise, that would prevent the redisclosure of information related to the outcome of the appeal.

The decision made by an appeal panel is final. If the Vice President for Academic Affairs or President recommends termination of a faculty member, the normal “termination for cause” procedures defined in the Faculty Handbook will be followed. If a student is suspended or expelled, an automatic appeal with the Vice President for Student Affairs will occur. If the Vice President for Student Affairs issues the suspension or expulsion of a student, an automatic appeal with the President will occur.
If the individual making the appeal is dissatisfied with the result, nothing prevents her/him from filing a complaint with state and/or federal agencies or a court of competent jurisdiction, including the Department of Education Office for Civil Rights and/or the Equal Employment Opportunity Commission.

11. FALSE COMPLAINTS

If a complainant knowingly files a false complaint, he/she may be subject to disciplinary action, up to and including, suspension, withdrawal, or employment termination from the university.

12. PREVENTION, AWARENESS, AND EDUCATION

Primary Prevention and Awareness Programs for New Students and Employees Related to Dating Violence, Domestic Violence, Sexual Assault, and Stalking

Current educational/outreach activities for new students:
- Harassment Policy session at new undergraduate student orientation at the beginning of each academic year.
  - This session includes an overview of the Harassment Policy, definitions of prohibited conduct, reporting/discussion options, frequently asked questions related to complaints, discussion of on-and off-campus resources, as well as review of those serving on the Harassment Grievance Board.
- Harassment Policy sessions at new graduate student orientation at the beginning of each fall and spring term.
  - This session includes an overview of the Harassment Policy, definitions of prohibited conduct, reporting/discussion options, frequently asked questions related to complaints, discussion of on-and off-campus resources, as well as review of those serving on the Harassment Grievance Board.

Current educational/outreach activities for sophomores, juniors, and seniors:
- Harassment Policy training and question and answer sessions at the beginning of each fall and spring term as requested.
  - This session is like that which is held at new undergraduate student orientation. Sessions began spring 2016.

Future educational/outreach activities for all students:
- United Educators "Campus SaVE Act" online course
  - For returning students – timing TBD
- United Educators “Student Title IX and Respect Training (START)” online courses
  - For new and returning students – timing TBD
- Bystander intervention/prevention training beginning TBD
- Risk reduction training beginning TBD

Current programs for new students:
- CASA Introduction
  - The CASA (Coalition Against Sexual Assault) student group makes a presentation to introduce members to new students and explain the services they provide.
- CASA New Student Movie Night
  - This move night is sponsored by CASA during New Student Orientation. It’s an informal gathering with the purpose of providing an opportunity for new students to get to know CASA volunteers better and vice versa. The goal is for CASA members to build relationships with new students in hopes that if the students need to utilize CASA’s services, they will feel more comfortable.
Ongoing Prevention and Awareness Campaigns for Students and Employees Related to Dating Violence, Domestic Violence, Sexual Assault, and Stalking

Current programs for all students:
• HRDC “Slow Walk”
  o The Hollins Repertory Dance Company “Slow Walk” happens right before “Take Back the Night” in October, and anyone can participate. Participants take an hour to walk across Front Quad as a silent salute to survivors and those affected by sexual assault.
• CASA “Take Back the Night”
  o CASA’s “Take Back the Night” in October is its biggest event for the year, as well as the fall semester. It’s an evening designed to create a supportive, compassionate, safe space for the Hollins community to share stories of how sexual assault has affected their lives. Anyone can come to support and listen to the stories being told. There is emphasis on the idea that coming to listen is just as valued as speaking. The idea is that what happens at the event and the stories that are shared remain in the space after the event is over.
• CASA “Flowers of Love”
  o CASA’s “Flowers of Love” April event is its biggest event for the spring semester. It’s geared to be a light-hearted event where people come to join in celebration and love. People can choose to write private letters of self-love to themselves in a time of trauma, and then they plant the letter under seeds in a flower pot. CASA supplies flower pots, and participants paint and decorate the pots together as a community.

13. TRAINING

Current educational/outreach activities for new employees:
• Harassment Policy review at new staff orientation throughout the year and at new faculty orientation at the beginning of each academic year.
  o This session includes an overview of the Harassment Policy, definitions of prohibited conduct, reporting/discussion options, frequently asked questions related to complaints, discussion of on- and off-campus resources, as well as review of those serving on the Harassment Grievance Board.

Future educational/outreach activities for all employees:
• United Educators "Campus SaVE Act" online course
  o For new and current employees – timing TBD
• United Educators "Workplace Harassment Prevention" online courses
  o For new and current employees – timing TBD

See Appendix “A” for additional information on training for those involved in responding to, investigating, and/or adjudicating sexual misconduct situations.

14. ACCOMMODATIONS WITH THE POLICY PROCESS AND PROCEDURES

Accommodations for the harassment complaint process and procedures include, but are not limited to, those needed for disabilities. Any accommodation needed in the filing of a harassment report or complaint, or in the investigation or appeal process, should be brought to the attention of a Harassment Grievance Board officer. The harassment grievance officer will share the request within two (2) working days with the Director of Human Resources if the requester is an employee or third party, or with the Dean of Academic Services if the requester is a student. Within three (3) working days, the Director of Human Resources and/or Dean of Academic Services will review the request, will determine if the request can be reasonably accommodated, and will notify the harassment grievance officer of the determination in writing. Once the harassment grievance officer receives
notification from the Director of Human Resources and/or Dean of Academic Services, she/he will inform the requester of the decision in writing within two (2) working days.

15. POLICY INFORMATION

This policy is a revision to existing policy and procedures previously updated July 1, 2019, and becomes effective September 1, 2019. Under any circumstances, this policy may be revised or amended at any time, as Hollins University may deem appropriate. Nothing in this policy is intended to create a contract or expectation beyond the intent of the policy described herein. Any and all policies, procedures, or other terms and conditions established by the university for students and employees shall remain in place.
### Hollins University Harassment Policy
Appendix A
Harassment, Title IX, and VAWA Training

<table>
<thead>
<tr>
<th>Person/People</th>
<th>Title IX Coordinator</th>
<th>Director of Campus Security</th>
<th>Asst. Dean of Students</th>
<th>Harassment Grievance Board</th>
<th>Campus Security Staff</th>
<th>Responsible Employees</th>
<th>Health &amp; Counseling Services (contracted service and survivor advocate)</th>
<th>University Chaplain (survivor advocate)</th>
<th>Coalition Against Sexual Assault (survivor advocate student group)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Training (beginning in 2014-2015 and annually, unless otherwise noted)</strong></td>
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<tr>
<td>Receipt of university Harassment Policy</td>
<td>x</td>
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<td>x</td>
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<td>x</td>
<td>x</td>
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<tr>
<td>Woods Rogers harassment training (one time)</td>
<td>x</td>
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<tr>
<td>DCJS Campus Safety and Violence Prevention Forum (specifically Title IX - one time)</td>
<td>x</td>
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<tr>
<td>Woods Rogers Labor &amp; Employment seminar (general harassment)</td>
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<td>United Educators Title IX webinars</td>
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<tr>
<td>United Educators Title IX, VAWA, and Threat Assessment: Legal Compliance and Sexual Violence Prevention (one time)</td>
<td>x</td>
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<tr>
<td>Four Corners of Title IX Regulatory Compliance (one time)</td>
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<tr>
<td>Four Corners of Title IX Regulatory Compliance Advanced Leadership Institute (one time)</td>
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<tr>
<td>Creating a Culture of Trauma-Informed Care (one time)</td>
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<tr>
<td>Mental Health First Aid certification course (one time)</td>
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<td>Mental Health First Aid recertification course (every 3 years)</td>
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<td>DCJS SART (Sexual Assault Response Team) training (one time)</td>
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<td>Sexual Assault Response and Awareness (SARA) Roanoke training (one time)</td>
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*DCJS = Virginia Department of Criminal Justice Services*