



This is what was found by the **Georgetown Pod** at **Georgetown University** on policies for handling complaints, the reporting process, resources, and possible outcomes. Some information was public; answers that were only found through follow up with contacts are noted.

- The link(s) to the reporting policy at our organization are here:
 - Organization, Company, University Policies
 - Office of Institutional Diversity, Equity, and Affirmative Action
 - Bias Reporting System
 - <u>Main Campus Faculty Ombuds Office</u> & <u>Graduate Student Ombuds Office</u>
 - Note: Reports dealing with sexual harassment should be made to the <u>Title IX Office</u> and are not covered in the scope of the summary here.
 - Department, Lab, Division, Advisor or Supervisor Policies
 - The Biology Department (where our Pod is centralized) does not have a formal, department-specific reporting policy.
 - Are reporting policies regularly reviewed? What is the process for changing policy?
 - The Bias Reporting Team meets every semester to review de-identified, aggregate data to assess the response to bias reports, identify patterns, and determine whether additional action is needed.
 - We were unable to find any additional information about the process for reviewing and changing reporting policies.
 - Are the rates of reporting made publicly available (e.g. # of reports each year)?
 - The Bias Reporting System (BRS) makes statistics available every year <u>here</u>. Some of the archived reports include the total # of reports submitted that year, but more recent reports (starting 2017) do not include the total number, just a % breakdown of the types of reports submitted.
- What mechanisms are available for reporting complaints, bias, microaggressions, harassment, and overt racism?
 - Who are the designated individuals/positions for reporting incidents?
 - Any student, staff, faculty member or visitor to campus can report a bias related incident that occurs anywhere on campus.



- Reports can also be filed on behalf of another person--a residential advisor, for example, can make a report on behalf of one of their residents.
- Can reports be made online? Yes Where? Anonymously? No
 - Reports can be made online through the Bias Reporting System <u>here</u>, or through IDEAA <u>here</u> (can also email <u>ideaa@georgetown.edu</u> or call (202) 687-4798).
 - Reports can also be filed to the Georgetown University Police Department at (202) 687-4343
 - To the best of our knowledge, reports are made confidentially but not anonymously.
 - However, a report can be made on another person's behalf (e.g. by an RA or professor on behalf of a student).
- Who do in-person and online reports go to? Who has access to see reports?
 - IDEAA Staff are listed <u>here</u>; the specific members who have access to reports are not identified.
 - Bias Reporting System: reports are reviewed by the Bias Reporting Team (BRT), which consists of "trained professionals from the Office of Student Equity & Inclusion (including the Center for Multicultural Equity & Access), LGBTQ Resource Center, Women's Center, Office of Residential Living, Office of Mission & Ministry, and the Office of Institutional Diversity, Equity, & Affirmative Action (IDEAA)."
 - Specific members not publicly listed
 - Georgetown University Police Department (GUPD) is specifically mentioned in another description of the Bias Reporting Team, so police may be involved (see below)
 - De-identified, aggregate data also is provided to appropriate University units for compliance reporting purposes.
- Are police included in the process? When and how? Are individuals accompanied by an advocate or someone from the organization?
 - Police can be involved in the process--if the complainant chooses to contact them, or, per the policy written <u>here</u>, because of regulations around reporting hate crimes.
 - "...federal law mandates that colleges and universities annually report certain crimes that occur on campus or near campus. The crimes must be reported as hate crimes if they manifest evidence that the victim was intentionally selected because of the victim's actual or perceived race, gender, religion, sexual orientation, ethnicity or disability. Hate crimes that are reported through this process are murder, sex offenses (both forcible or nonforcible), robbery, aggravated assault, burglary, motor vehicle theft,



manslaughter (negligent and non-negligent), arson, and any other crime involving bodily injury that manifests evidence that it is a hate crime as described above."

- The outcomes for Bias Reporting include an investigation through the Georgetown Police Department or filing a complaint through the Office of Student Conduct; the Bias Reporting team might also include members of GUPD
 - The team is described as including "trained professionals in Student Affairs, the Office of Institutional Diversity, Equity and Affirmative Action, Campus Ministry, the Georgetown Police Department and other University offices"
- IDEAA staff & members of the Bias Reporting Team work with folks who file complaints, though their roles if/when police are involved are not explicitly described

• What are the outcomes or consequences for reported individuals?

- Follow-up by supervisor, training (bias, etc.), disciplinary action, termination.
 - Follow-up procedures for reported individuals, following the Faculty Responsibilities code, include but are not limited to: "training, coursework, mentoring, participation in workshops or support groups, monitoring, written apology, a course of counseling, letter of reprimand, loss of faculty privileges (including removal from office, project, or home unit; loss of office space; research funding; access to Teaching Assistants or Research Assistants; attendance at faculty meetings; and voting rights), probation, denial of a salary increase, bonus, or other remuneration, reduction of salary, unpaid suspension from work for a stated period of time, removal of duties, with commensurate reduction in pay, reduction in rank; termination of employment; revocation of tenure; or any other sanction that is determined by the decisionmaker to be fair and proportionate to the violation."
- Who decides the outcomes/consequences? What is the process?
 - <u>IDEAA process</u> -- Outcomes & consequences are determined by IDEAA staff and consider past violations in addition to the current complaint
 - IDEAA Process Summary included at the end of this document.
 - <u>Bias Reporting System process</u>: Bias Reporting Team reviews reports, consults with the reporting party, and, if applicable, will work with other campus offices to determine response
 - <u>Specific outcomes</u> possible through the Bias Reporting System linked here and available at the end of this report.
 - Are reports tracked? Yes How are they tracked? By who?



- BRT meets every semester to review de-identified, aggregate data to assess the response to bias reports, identify patterns, and determine whether additional action is needed; de-identified, aggregate data also is provided to appropriate University units for compliance reporting.
- Are repeated complaints escalated to a disciplinary board? What is the process?
 - To the best of our knowledge, there are no procedures or processes outlined for when repeated complaints are made and whether that would escalate to a disciplinary board. However, the BRT keeps a record of past complaints when reviewing bias reports and this record could potentially be used to determine the corrective action.

What resources are available for individuals reporting?

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- Counselors or advocates, especially those of the same race, ethnicity, and gender.
 - Counseling is available through IDEAA
 - Both IDEAA & the BRS procedures involve meeting with a member of either the IDEAA staff or the BRT; they both also mention a referral to other campus resources
 - During the COVID-19 pandemic, sessions with community mental health providers have been available for students at no cost during the 2020-2021 academic year. <u>These providers</u> are "focused on serving traditionally marginalized or underserved communities, particularly women and femmes of color who have experienced sexual assault, harassment, or violence. These services have been extended to include students who are struggling with racial trauma." Virtual mental health services have also been available to students through the <u>university's partnership with HealthiestYou</u>.
- Automatic or requested investigation of potential impact on grades or evaluations.
 - Neither the IDEAA policy or Bias Reporting System automatically performs or provides methods for requesting an investigation of potential impact on grades or evaluations.
- Protection against retaliation or repercussions, accomodations for continuing work/courses, option for pass/fail or outside assessment.
 - Graduate students have protected rights to file bias complaints, request interim measures while complaints are being reviewed, and formally grieve non-compliance with policies outlined in our union contract. These rights are described in the union contract located on the union website: (Articles 8 & 9) <u>https://www.wearegage.org/our-contract</u>
 - The IDEAA policy makes a statement about retaliation being prohibited and that "retaliation should be reported promptly to IDEAA or, in connection with Sexual Misconduct, the Title IX Coordinator, and if proven, may result in disciplinary action up to and including dismissal"



Additionally states that "The appropriate Executive Vice President, Chief Operating Officer or Senior Vice President shall ensure that the approved corrective actions are smoothly implemented and take measures to protect against retaliatory actions related to the allegations resulting in the corrective actions" once corrective measures have been implemented.

• What resources are available to groups raising issues or proposing changes?

- Petitions of # signatures trigger a town hall, meeting with organizational leadership, or policy change. What is the follow-up process for town halls and meetings?
 - We were unable to find formal procedures for follow-up on town halls and meetings. The university has issued communications in the past outlining their responses to the demands of student activist groups, like the Black Survivors Coalition (university statement <u>here</u>).
- Working groups or committees with power to change or propose changes to policy.
 - The Biology Department formed a <u>DEI Working Group</u> in 2020
 - There's currently a Diversity, Equity, and Inclusion Working Group for the athletics programs, linked <u>here</u>
 - There was a Working Group on Reporting in the late '00s-early '10s; their report is available <u>here</u>
- Cultural surveys, regular or only after wide-spread reports or high-profile incidents.
 - Georgetown University has only conducted one <u>Culture Climate Survey</u> which is set to be published Spring 2021.
- Leadership proactively asks students and/or staff for input on how to improve.
 - The university has an open channel for students, faculty, and staff to provide input through submitting "*reflections, inspirational messages, and suggestions*" to the Campus Climate Newsletters. The newsletters provide ongoing resources, highlights the steps that the University has taken to enhance inclusion and strengthen campus climate (e.g., officially recognizing <u>Juneteenth as a University holiday</u>, expanded mental health, wellness, and healthcare resources by waiving fee-for-services counseling, etc).



Recommendations from the Georgetown URGE Pod for how to enhance Complaints and Reporting Policy for Georgetown University

We have identified several weaknesses in the current policy:

- Bias reports can be made confidentially but not anonymously
- There is currently no clear protection for individual reporting against retaliation and repercussions in terms of accommodations for continuing work/courses, option for pass/fail or outside assessment
- There are no department-specific reporting policy
- No accountability statements are provided in the case that a student, faculty member, or staff experiencing bias, harassments, or other forms of abuse in the event that a grievance procedure fails to address the problem or is extended for long periods of time that can be emotionally, physically, or financially taxing (which may result in drops in grades, reduced research productivity, other hardships, or termination).

We have identified several recommendations that could make bias reporting policy better and more equitable:

- The availability of the Bias Reporting System should be made known to students, faculty, and staff by including it in the class syllabi, onboarding package, or job contracts.
- The department should have a designated mediator/resource for filing complaints against professors, faculty advisors, or supervisors to aid students with the complaint process.
- The policy should clearly outline the measures the university or a department would take to protect the person making the report (e.g., evaluate drops in grades, reduced research productivity, etc) and provide solutions to how to mitigate these problems that could result from a grievance procedure.



Session 2 Deliverable: Appendix

- **IDEAA Process Summary** (adapted from the procedures outlined <u>here</u>):
 - IDEAA staff process intake of reports and meet with the Complainant and Respondent "to provide a general understanding of the relevant policy and this grievance procedure, as well as University support resources … may also involve a discussion of any interim or supportive measures that may be appropriate concerning the individual's academic, University housing, and/or University employment arrangements."
 - Then move on to either informal resolution or investigation:
 - Informal resolution:
 - "Unless otherwise prohibited by University policy, IDEAA shall propose voluntary informal resolution, including mediation, to a Complainant ... If the Complainant agrees to informal resolution, the potential Respondent will be informed about the allegations and the informal resolution process, and offered an opportunity to participate in informal resolution. If both parties do not voluntarily agree to participate in the informal resolution process, the Complainant may proceed to Step II [investigation]."
 - If both parties agree to informal resolution, it will be mediated by IDEAA's staff or by another representative selected by IDEAA; if they reach a resolution that is accepted by both parties, a written agreement will be signed and dated by both parties. IDEAA will monitor compliance to the agreement, and the case will be closed.
 - If an agreement is not reached during information resolution, the Complainant can request that they move on to Step II (Investigation).
 - Investigation:
 - A formal complaint can be initiated by submitting "a written and signed statement and any supporting documentation detailing the allegations of discrimination, harassment or related retaliation and identifying the individuals who engaged in the alleged conduct"
 - IDEAA provides the Respondent with the written complaint, and they have 20 days to provide a written response and any supporting documents. The Complainant will then be provided

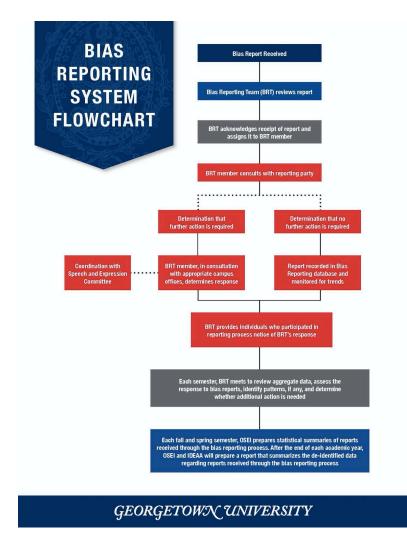


with a copy of the response and will have 10 days to submit a written rebuttal.

- Both parties can submit evidence and identify witnesses to support their claims.
- IDEAA conducts the investigation, which will include reviewing the evidence provided and interviewing witnesses, as well as the Complainant and Respondent.
- IDEAA will complete a written report and determine whether the University's policies on discrimination have been breached, using a preponderance of the evidence ("more likely than not") standard, and will include documentation supporting its findings.
- Notification:
 - If IDEAA finds that no discimination policies were violated, they will notify both parties of that decision on the same day, and will include information about appeal procedures in that message.
 - If IDEAA finds that policies were breached, they will:
 - Notify both parties on the same day, as much as is possible given confidentiality procedures; this message will include information about how to appeal
 - Send their report to the Respondent's Executive Vice President or Senior Vice President, or their designee, or other University officials on a need-to-know basis (in keeping with confidentiality procedures)
 - Direct action to correct the situation, including sanctions that are in proportion with the violation. "Any record of past violations of University policies, as well as the nature and severity of such past violations, may be considered" in devising these sanctions.
- Corrective Action:
 - IDEAA will monitor the implementation of these corrective actions.
 - "The appropriate Executive Vice President, Chief Operating Officer or Senior Vice President shall ensure that the approved corrective actions are smoothly implemented and take measures to protect against retaliatory actions related to the allegations."
- Appeal: procedures outlined in the linked document



Bias Reporting System Process:



Possible outcomes:

- **Conversation** between BRT member and the individual alleged to have engaged in a bias incident.
- **Mediation/facilitated conversation**. A BRT member may facilitate a voluntary conversation between the reporting individual and the individual alleged to have engaged in a bias incident. The parties would not be required to meet in-person.
- Educational programming. Training and/or educational resources may be offered to the individual(s) involved in the bias incident, on a voluntary basis.
- **Restorative practices.** Where both the reporting individual and the individual alleged to have engaged in a bias incident express an interest in the use of restorative practices to



respond to a reported incident, trained community members may be assigned to utilize restorative practices to facilitate healing and understanding following a bias incident.

- Referral to formal University process. In instances where the reported conduct may pose a threat to the health or safety of community members, or where conduct may constitute a violation of a University policy, the matter may be referred to the appropriate University office. Individuals may also choose to file a formal complaint with University offices such as the <u>Office of Student Conduct</u> and the <u>Office of Institutional Diversity</u>, <u>Equity</u>, and <u>Affirmative Action</u>
- **Institutional responses.** Depending upon the nature of an incident, action from the university might be necessary, such as removal of graffiti, notice to the community, and offering supportive resources and assistance for impacted communities.
- **No further action.** The reporting individual or the BRT may determine that no further action is necessary; the BRT will evaluate the reported conduct to ensure that additional action is not needed.