

Oberlin College

Nondiscrimination and Anti-Harassment Policy, Prohibited Relationships Policy



Contents

Nondiscrimination and Anti-Harassment Policy

I.	Policy Statement	2
II.	Definition of Discrimination and Harassment	3
III.	Scope	5
IV.	Investigation Procedures	5
V.	Other Provisions	11

	Prohibited Relationships Policy	15
--	--	-----------

I. POLICY STATEMENT

Oberlin College and Conservatory (“Oberlin College”) is committed to creating an environment free from unlawful discrimination and harassment and complies with all applicable federal, state, and local laws regarding nondiscrimination. Oberlin College supports equal opportunity for all persons and prohibits discrimination or harassment on the basis of race, color, sex, religion, national origin, disability, age, genetic information, military or veteran status, ancestry, marital status, sexual orientation, gender identity, or gender expression. Oberlin College does not discriminate in access to or participation in any college program or activity including, but not limited to, admissions, academic programs, employment, or public accommodations. In addition, the College prohibits retaliation against anyone participating in or conducting an investigation into a reported violation of this policy.

Discrimination and harassment jeopardizes the mental, physical, and emotional welfare of community members, as well as the physical safety of our community. Discrimination and harassment diminishes an individual’s dignity and impedes their access to educational, social, and employment opportunities. It can permanently impact lives and may cause lasting physical and psychological harm. Discrimination and harassment violate our institutional values and their presence in the community presents a barrier to fulfilling the College’s scholarly, research, educational, artistic, and service missions. Discrimination and harassment, therefore, will not be tolerated at Oberlin College and is expressly prohibited. Anyone who is aware of discrimination or harassment by a College employee, student, trustee, volunteer, or contractor should promptly report such misconduct to the Director of the Office of Equity, Diversity, and Inclusion (“OEDI”) or a Deputy Title IX & Equity Coordinator. Upon receiving a formal complaint to the OEDI Director or a Deputy Title IX & Equity Coordinator, the College will promptly respond by taking the appropriate steps to eliminate discrimination or harassment, prevent its recurrence, and address its effects.

This policy provides information regarding the College’s prevention and education efforts related to discrimination and harassment, as well as how the College will proceed once it is made aware of reports of policy violations in keeping with our institutional values and our legal obligations under all applicable laws. The procedures for investigation, complaint resolution, and appeals are provided at go.oberlin.edu/edi-formal-resolution.

This policy does not cover statements, written materials, research, or creative works that are determined by the instructor to be appropriate classroom, research, or artistic subject matter. Nothing in this policy will be interpreted to violate individual constitutional rights of expression, to infringe academic freedom or freedom of academic inquiry, or to compromise the College’s educational mission. Offensive

speech alone is not legally sufficient to establish a violation of this policy. The expressive conduct must constitute discrimination or harassment as defined within this policy in order for a violation to occur.

Importantly, Oberlin College affirms its commitment to the transformative power of education while maintaining an equitable and safe living, learning, and work environment. This policy and related procedures are intentionally designed to draw on Oberlin’s expertise as educators with knowledge of student development theories, inclusive community practices, and the dangers of the inappropriate exercise of positional authority. Reporting Parties, Responding Parties, and witnesses are therefore centered in these processes to encourage both individual agency and accountability while also affirming the College’s responsibility to effectively eradicate discriminatory, harassing, or retaliatory conduct.

This policy uses they, them, and theirs as third person singular gender-neutral pronouns, in recognition that individuals have a range of gender identities and forms of self-identification.

This policy does not limit the rights of any individual to seek remedies that are available under federal or state law such as through the Equal Employment Opportunity Commission, the Department of Education’s Office of Civil Rights, the Ohio Commission on Civil Rights, or the legal system.

II. DEFINITION OF DISCRIMINATION AND HARASSMENT

For the purposes of determining whether a particular course of conduct constitutes discrimination or harassment under this policy, the following definition will be used:

Conduct that is based upon an individual’s race, color, sex, religion, national origin, disability, age, genetic information, military or veteran status, ancestry, marital status, sexual orientation, gender identity, or gender expression that:

- A. adversely affects a term, condition or benefit of an individual’s participation in a College program or activity or access to a College program or activity; or
- B. is a contributing factor in decisions affecting that individual’s participation in or access to a College program; or
- C. has the purpose or effect of unreasonably interfering with an individual’s participation in a College program or activity or creating an intimidating, hostile, offensive, or abusive environment that is so severe or pervasive to be intolerable to a reasonable person participating in that College program or activity.

Statement Prohibiting Disability Discrimination

The College's commitment to diversity and inclusiveness extends to individuals with disabilities. The College has designated the Director of the Office of Equity, Diversity, and Inclusion as the Section 504/ADA Coordinator to manage the College's efforts to comply with the federal Section 504 of the Rehabilitation Act of 1973 and the Americans with Disabilities Act of 1990.

Disability discrimination can occur whenever a qualified individual with a disability is denied the same equal opportunities afforded to other similarly situated individuals on the basis of their disability status. Under applicable disability laws, an individual with a disability is a person who: (1) has a physical or mental impairment that substantially limits one or more major life activities; (2) has a record of such an impairment; or (3) is regarded as having such an impairment. Temporary, non-chronic impairments that do not last for a long time and that have little or no long-term impact usually are not disabilities. The determination of whether an impairment is a disability is made on a case-by-case basis.

A qualified individual with a disability is a person who, with or without reasonable modifications to rules, policies or practices; the removal of architectural, communication or transportation barriers; or the provision of auxiliary aids or services, meets the essential requirements for the receipt of services or participation in programs or activities provided by the College. The College is obligated to make a reasonable accommodation only to the known disability of an otherwise qualified individual. Generally, it is the responsibility of the individual to make the disability status and related need for an accommodation known to the appropriate College official. Information regarding campus resources for individuals with disabilities are available at go.oberlin.edu/edi-support.

Retaliation Protection. The College will take appropriate steps to ensure that a person who in good faith reports or participates in a report, investigation or resolution under the policy; or is accused of violating this policy will not be subjected to retaliation. This protection exists even if a complaint is dismissed or the Responding Party is not found to have violated this policy. The College will take appropriate steps to ensure that all participants in an investigation are treated fairly. Anyone who believes that he or she is experiencing retaliation is strongly encouraged to report this concern using the same procedures. Retaliation is any adverse action against a Reporting Party, Responding Party, witness, or any other person participating in or conducting an investigation or resolution of a complaint that negatively alters the terms, conditions or benefits of that individual's equitable access to College programs or activities.

III. SCOPE

The policy applies to all complaints of discrimination, harassment or retaliation not covered by the Title IX Sexual Harassment Policy that involves participants in a College program or activity regardless of the location. Oberlin College's Title IX Sexual Harassment Policy, as proscribed by Title IX of the Education Amendments Act of 1972, governs procedures for resolving reports of specific types of sexual harassment. If the conduct giving rise to an allegation of a violation of this policy also violates the Title IX Sexual Harassment Policy, the Investigator will conduct one investigation following the procedures outlined in the respective policies. One Hearing Panel/Officer will resolve the entire matter.

IV. INVESTIGATION PROCEDURES

The College will investigate discrimination and harassment complaints under this policy to ensure prompt and equitable resolutions of complaints consistent with procedural guidelines developed by the Director of the Office of Equity, Diversity, and Inclusion in consultation with the Vice President, General Counsel and Secretary and Chief Human Resources Officer. Those procedures are available at go.oberlin.edu/edi-investigation-procedures.

Reports to local law enforcement. The College encourages those who believe they experienced a sexual assault or any other crime to file a report with local law enforcement. Campus Safety professionals or Office of Equity, Diversity, and Inclusion professionals are available, upon request, to assist the individual in making the report. Collection and preservation of evidence relating to a reported sexual assault is essential for law enforcement investigations so prompt reporting to law enforcement is especially critical.

A. Complaints

All complaints of discrimination and harassment should be submitted in writing to the Director of the Office of Equity, Diversity, and Inclusion or one of the Deputy Title IX & Equity Coordinators.

Dr. Rebecca Mosely

Director of the Office of Equity, Diversity, and Inclusion/ Title IX Coordinator/
Section 504 and ADA Coordinator
Carnegie Hall, Room 204 | 440-775-8555
Email: edi@oberlin.edu or Rebecca.Mosely@oberlin.edu
go.oberlin.edu/EDI

Deputy Title IX & Equity Coordinators Athletics

Erica Rau, Philips Gym

Erica.Rau@oberlin.edu | 440-775-8500

College of Arts and Sciences

Elizabeth Hamilton, Cox Administration Building 101

Elizabeth.Hamilton@oberlin.edu | 440-775-8410

Conservatory

Chris Jenkins, Bibbins Hall 113F

Chris.Jenkins@oberlin.edu | 440-775-8200

Catherine Sherman, Bibbins Hall 113F

Catherine.Sherman@oberlin.edu | 440-775-8200

Student Life

Kourtney Arcaba, Wilder Hall 105

Kourtney.Arcaba@oberlin.edu | 440-775-5343

Anonymous Reports. Anonymous reports of violations of this policy may be made to the **Campus Conduct Hotline 866-943-5787**. The hotline is staffed by a third-party service and is available 24 hours/day and seven days a week. Please note that the College may not be able to resolve complaints received from anonymous sources unless sufficient information is furnished to enable the College to conduct a meaningful and fair investigation. The College will, however, take whatever steps it deems appropriate in the best interests of the overall College community, consistent with the information that is available.

B. Adaptive Resolution Process

The Adaptive Resolution Process (ARP) is a series of inclusive conflict resolution practices that yield participant-authored, effective, and just outcomes through examination of attitudes and behaviors that contributed to the conflict or harm; and that result in clear accountability measures that repair harm and discourage future harm. Adaptive dispute resolution practices - including conflict coaching, facilitated dialogue, mediation, and restorative practices - are available to participants on a voluntary basis. ARP is an alternative to the formal resolution process and does not result in College-mandated disciplinary action against the responding party. The College, however, will enforce any signed resolution agreement.

ARP can be used upon the request of the parties and upon review of the formal complaint by the Director of the Office of Equity, Diversity, and Inclusion to verify that ARP is appropriate for the dispute. Both parties must provide written confirmation to the Title IX Coordinator that they wish to utilize ARP to resolve

the complaint, and what process (es) they wish to utilize as part of the resolution. Because this process is voluntary, the College will not mandate any specific process or require any party to participate in the ARP. The OEDI Director is responsible for managing the ARP once it begins. Ordinarily the ARP will be completed within sixty (60) business days of the request for the ARP. Either party or the College can request to end the ARP at any time if one of the following occurs:

- A. One of the parties fails to participate in the ARP.
- B. One of the parties is reported to have additional new violations of College policy towards the other party.
- C. Both parties agree in writing that the matter discussed in the formal complaint has been resolved to their satisfaction.

Once the ARP process is completed, the OEDI Director will confirm in writing to both parties that the formal complaint has been resolved. Records of the resolution process will be maintained in the Office of Equity, Diversity, and Inclusion per the OEDI Record Retention Policy.

ARP may not be used in cases where an employee is the responding party and a student is the reporting party, but may be used in cases when both parties are employees.

More information on ARP and other resolution processes can be found at go.oberlin.edu/edi-adaptive-resolution.

C. Formal Resolution Process

The Formal Resolution Process (FRP) can be initiated at the request of the Reporting Party, Responding Party, or the College. The OEDI Director is responsible for managing the FRP once it begins. The OEDI Director will inform the parties of the reported policy violations, supportive measures available to them during the FRP, and procedures followed during the FRP. The FRP consists of an investigation and live hearing to determine whether a Responding Party has violated College policy using the *preponderance of the evidence* standard. Under the FRP, Responding Parties are presumed not to have violated the policy unless sufficient evidence exists to show otherwise. More information about those procedures can be found at go.oberlin.edu/edi-formal-resolution.

a. Investigations

Investigations are ordinarily conducted by an independent law firm specializing in higher education and civil rights compliance. In all cases, the Investigator will respond to the report in a prompt, thorough, procedurally fair, and effective manner. The Investigator will conduct a fact-finding

investigation, which includes meeting separately with the Reporting Party, Responding Party, and pertinent witnesses, and reviewing and analyzing other relevant information. The Investigator will prepare a written report at the conclusion of the investigation. Before the report is finalized, the participating Reporting Party and Responding Party will be given the opportunity to review and respond to the report.

Upon receipt of a complaint, the Investigator will strive to complete its investigation and submit to the parties a draft investigation report within 30 business days. Upon receipt of the draft report, the parties will have ten (10) business days to review and respond to the Investigator. The Investigator will submit a final investigation report to the Title IX Coordinator within five (5) business days of receiving the parties' comments unless further investigation is required. The final investigation report will be made available to the parties at least ten (10) days prior to the date of the hearing.

b. Advisor

All parties are entitled to advice and support during the process. In addition, the parties may consult with the OEDI Director or a Deputy Title IX & Equity Coordinator, who does not participate directly in formal resolution.

During the investigative process, the Reporting Party and the Responding Party may have an advisor present at any meeting with the Investigator. The parties may select their own advisor, or may select an advisor from a list of campus community members who have undergone Title IX training. An outside advisor will be required to meet with the Hearing Coordinator or the OEDI Director in advance of any participation in the proceedings to be informed about College expectations regarding the role of advisors.

The advisor may not be a witness in the matter and may not participate directly in the investigative process, but may be present to provide support to or advise the Reporting Party or Responding Party. The advisor may not speak on the behalf of their advisee. All communication regarding the process must come from the advisee to the College. The advisor may not delay, disrupt, or interfere with any meeting or proceeding.

Attorneys serving as advisors must adhere to the expectations of the role as described in this policy. The Hearing Coordinator has the authority to determine what constitutes appropriate behavior on the part of an advisor and whether the person may remain in the proceedings. At no time will profanity, yelling, or otherwise unprofessional or abusive behavior be allowed.

Parties who do not select their own advisor will be appointed one by the OEDI Director.

c. Hearing

The Hearing Coordinator will schedule a hearing within ten (10) business days of receiving the Investigator's final report. All hearings will be live either in person or via video conferencing. Either party has the right to request that they not be in the same room with the other party for the hearing. Before the hearing, the Hearing Coordinator will schedule a meeting with the parties to explain the hearing procedures and request any information that is needed from them before the hearing.

A party may choose not to participate in a hearing or to respond to questions. It is important to note that doing so may limit the hearing panel's ability to assess the credibility of the party and the evidence provided.

Standard of proof. The Panel's findings will be made using the preponderance of the evidence standard. This standard requires that the information supporting each finding be more convincing than the information offered in opposition to it. Under this standard, individuals are presumed not to have engaged in the conduct reported unless a preponderance of the evidence supports a finding that discrimination, harassment or retaliation occurred.

D. Corrective action

Corrective action is designed to restore or preserve equitable access to College programs and activities while honoring the College's educational mission. Corrective actions also serve to promote safety or to deter future threatening or harmful behavior. Some behavior is so harmful to the College community or so deleterious to the educational process that it may require more serious sanctions, such as removal from College housing, specific courses, job duties, or activities; suspension from the College; or expulsion/employment termination. Additional information regarding possible corrective action is described at go.oberlin.edu/edi-corrective-action.

If the Hearing Panel determines that the Responding Party committed the alleged misconduct, the College will take action to address the behavior, prevent the recurrence of that misconduct, and remedy its effects.

Once a decision has been finalized, the Hearing Panel/Officer will issue a statement containing the findings and sanctions including the rationale used to determine both within five (5) business days to the Reporting and Responding Parties and the OEDI Director.

Dual roles. When the Responding Party holds a role within the College in addition to that of a student (e.g., student-employee), the sanctions may apply to all roles held by the student provided there is a sufficient nexus between the alleged conduct and the position held by the student. If the student-employee is found to have engaged in sexual misconduct in their employment capacity, the student-employee may be subject to sanctions both in connection with their employment and their student status.

E. Appeals

Either party may appeal the outcome or sanctions imposed. The appeal must be submitted within five (5) business days of receiving the Hearing Panel's or Hearing Officer's decision letter. To request an appeal, the party must submit a written appeal to the Title IX Coordinator who will appoint a trained appeals officer.

1. Grounds for Appeal. A party may only seek appeal on the findings under the following grounds:

- a. A material deviation from the procedures affected the outcome of the case;
- b. There is new and relevant evidence that was not reasonably available when the determination of responsibility was made that could affect the outcome;
- c. There is a conflict of interest or bias on the part of the OEDI Director, investigator, or decision-maker that could affect the outcome of the matter. An individual's past education or professional experience alone is insufficient to establish a conflict of interest or bias; or
- d. The sanctions are not appropriate or disproportionate to the determined violation(s).

Both parties will be notified if either party submits an appeal and will be informed of the grounds of the appeal. A party may submit a short written response to the other party's appeal within five (5) business days of this notification.

2. Appeal Procedure. In any request for an appeal, the burden of proof lies with the party requesting the appeal, as the original determination and sanction are presumed to have been decided reasonably and appropriately. The Appeals Officer will review the record, the information submitted on appeal and issue a written report that may result in the following outcomes:

- a. If there was a material deviation from procedure that affected the outcome, the Appeals Officer may refer the matter to the Hearing Panel/Officer to rectify the error, or in rare cases where the error cannot be resolved, a new hearing will be ordered.

- b. If a conflict of interest or bias on the part of the OEDI Director, investigator, or decision-maker is deemed to have affected the outcome, the Appeals Officer may refer the case to an appropriate place in the process to rectify this affect.
- c. If newly-discovered information appears relevant, the Appeals Officer can recommend that the case be returned to the Decision Maker/Hearing panel to assess the weight and effect of the new information and render a determination after considering the new facts.
- d. If the sanctions appear inappropriate or disproportionate, alter the sanctions, accordingly.
- e. Affirm the findings and sanctions.

The Appeals Officer will issue a written decision on the appeal simultaneously to the Reporting Party, Responding Party and the OEDI Director within ten (10) business days from the date of the submission of all appeal documents by both parties. Appeal decisions of the Appeals Officer are final.

V. OTHER PROVISIONS

Confidentiality Concerns. The Office of Equity, Diversity, and Inclusion is mandated to investigate all reports of policy violations and implement prompt and effective remedial action in response to violations and, therefore, cannot promise confidentiality. The College handles all matters professionally and discreetly by sharing information only with those who need to know and by informing participants of those disclosures. The College maintains the privacy of student records in compliance with the federal Family Educational Rights and Privacy Act ("FERPA").

Confidential Reporting. The College recognizes that deciding whether to report discrimination, harassment or retaliation can be difficult. All individuals are encouraged to seek the support of trained professionals on campus and in the local community. These professionals can provide guidance in making decisions, information about available resources and procedural options, and assistance in the event that a report and/or resolution under this policy is pursued. As detailed online at go.oberlin.edu/EDI, there are Confidential and Privileged Resources which under Ohio law cannot share information without the consent of the individual seeking assistance. Short-term and free counseling provided by licensed psychologists and counselors is available to registered students.

No time limits for reporting. The College strongly encourages Reporting Parties to make reports as soon as possible. Timely reporting enables the College to provide greater options for support, investigation, and resolution, especially as it relates to crisis counseling, the preservation of evidence, and security and law enforcement

responses. The lapse of time may make it more difficult to gather relevant information and prevent similar misconduct. The College does not, however, limit the time frame for reporting for incidents within the scope of this Policy. Reports of incidents occurring outside of the scope of this policy (e.g., individuals are no longer participants in a College program and activity) will be reviewed but not investigated under this policy.

Intentionally and knowingly filing a false report. Individuals should not be discouraged from reporting discrimination, harassment, or retaliation under this policy simply because there appears to be a lack of corroborating evidence. Appropriate interventions may be available and warranted even in the absence of a finding of a policy violation. However, any member of the College community who knowingly or recklessly files a false complaint or provides false information under this policy or intentionally misleads College officials who are investigating or reviewing a complaint of alleged discrimination, harassment or retaliation may be subject to disciplinary action. This does not apply to reports made in good faith, even if the facts alleged in the Complaint cannot be substantiated by an investigation.

Education and training. Oberlin College offers regular prevention programs and ongoing education programs for all student and employees. All new and transfer students and all new employees will receive education on non-discrimination and anti-harassment, including separate Title IX Sexual Harassment training, within three months of their enrollment or appointment. All continuing employees are expected to complete non-discrimination and anti-harassment training, including separate Title IX Sexual Harassment training, on a biennial basis. The Office of Equity, Diversity, and Inclusion will provide all continuing students and employees with opportunities for education on new policies and best practices for creating diverse, equitable, inclusive communities of excellence.

- Members of the College community are encouraged to contribute to the prevention, intervention, and effective response to discriminatory, harassing, or retaliatory conduct. All members of the community may play a role in building a safe and just educational environment by:
- Modeling healthy and respectful behavior in personal and professional relationships;
- Increasing personal awareness of what constitutes discrimination, harassment, or retaliation;
- Speaking out against behavior that encourages intolerance or discriminatory, harassing or retaliatory actions or that discourages reporting;
- Developing the necessary skills to be an effective and supportive ally to community members negatively impacted by harmful conduct;

- Intervening in situations that can lead to violations of this policy, and
- Interrupting an incident of misconduct when it is safe to do so.

Policy review. Beginning in the fiscal year 2023, the Office of Equity, Diversity, and Inclusion will lead a campus-wide review of this policy on a biennial basis and, if necessary, will recommend revisions to the senior administration and the Chief Human Resources Officer. Edits made to keep information related to resources will be made as needed to keep the information in this policy accurate.

Policy distribution. It is the responsibility of the Office of Equity, Diversity, and Inclusion to advise the campus community of this policy on its website and to provide all community members with access with this policy; to provide all faculty, staff, and students with a notification of the policy on an annual basis through email; and to conduct trainings on an annual basis. It is the responsibility of the Office of Admissions and Financial Aid to advise all applicants and admitted or transfer students of this policy on its website and provide all admitted students with access to this policy. It is the responsibility of the Department of Human Resources to advise all employees, volunteers, and contractors of this policy on its website and provide all new employees and volunteers with access to this policy. It is the responsibility of the Office of the Dean of Students to advise all students of this policy on its website.

Complaints or concerns. Students, employees, or other individuals may direct complaints or concerns about this Nondiscrimination and Anti-Harassment Policy to the OEDI Director, a Deputy Title IX & Equity Coordinator, and/or to the following external agencies:

U.S. Department of Education Office for Civil Rights

Office for Civil Rights Cleveland Office
1350 Euclid Avenue, Suite 235
Cleveland, OH 44115
(216)-522-4970 | TTY: (800)-877-8339
Email: OCR.Cleveland@ed.gov
Website: <https://www2.ed.gov/about/offices/list/ocr/index.html>

U.S. Equal Employment Opportunity Commission

Cleveland Field Office
Anthony J. Celebrezze Federal Building
1240 E. 9th Street, Suite 3001
(800)-669-4000 | TTY: 1-800-669-6820
ASL Video Phone: 844-234-5122
Email: info@eeoc.gov
Website: <https://www.eeoc.gov/field-office/cleveland/location>

Ohio Commission on Civil Rights

Cleveland Regional Office

Lausche State Office Building

615 W. Superior Ave., Suite 885

Cleveland, OH 44113

(216)-787-3150 | TTY: (614)-752-2391

Website: <https://crc.ohio.gov/Home.aspx>

Effective date. This policy is effective August 14, 2020, and supersedes any and all previous, discrimination or harassment policies that may have been in effect in any written or electronic format previously.

PROHIBITED RELATIONSHIPS POLICY

Intimate, sexual, or romantic relations between persons occupying asymmetrical positions of power or authority, even when consensual, compromises respect for standards of professional conduct and unreasonably subjects the employee and College to claims of sexual harassment. Similarly, these relationships may impact third parties based on perceived or actual favoritism or special treatment based on the relationship.

Oberlin College and Conservatory (“Oberlin College”) faculty, staff, and trustees are prohibited from engaging in sexual, intimate, or romantic relationships with Oberlin College students or participants in College sponsored programs to whom they are not married or in a formal domestic partnerships, even when both parties believe the conduct is consensual. This prohibition reflects an understanding that power inequalities due to role differences between those with positional authority and students or program participants affect the possibilities of effective consent. This prohibition also reflects the College’s commitment to respecting the integrity and character of the unique teaching and mentoring relationship that exists between instructors and students or program participants. Any individual who believes they have been harmed because of undue access or advantage, favoritism, restricted opportunities, or unfavorable treatment resulting from a sexual, intimate, or romantic relationship between an employee or trustee and a student or program participant may file a complaint. Employees or trustees who are aware of intimate, sexual, or romantic relationships between an employee or trustee and a student or program participant have a responsibility to report that information to the Director of the Office of Equity, Diversity, and Inclusion.

In cases where there is a pre-existing relationship between an employee or trustee and a student or program participant, the employee must disclose the relationship to the Office of Human Resources and a trustee must disclose the relationship to the Office of the Vice President, General Counsel or Secretary before beginning employment, program supervision, or trustee service so that a conflict of interest plan can be developed. Employee and trustees have an ongoing duty to report any potential conflict of interest that might develop because of a change in status of a student or program participant.

Retaliation against persons who report concerns about prohibited relationships is prohibited and constitutes a violation of this policy.

Alleged violations of this policy will be resolved consistent with the procedures for violations of the Nondiscrimination and Anti-Harassment Policy.

OBERLIN

COLLEGE & CONSERVATORY