

Introduction

To ensure broad communication, certain key University policies are published on an annual basis in a special policy section of the Record. These policies are also available in a number of other places, including the human resources website at <http://hr.wustl.edu>.

All members of the University community are essential to the continued endeavor for excellence in the teaching, research, service and patient-care missions. Establishing and sustaining an open, positive working and learning environment for faculty, staff and students is a shared responsibility. These key policies are intended to promote and support such an environment. Please become familiar with the content of each of these policies and the resources available to you.

Washington University is committed to the maximum use of all human resources and the goal of equal opportunity. Every effort shall be made to ensure that all employment decisions, University programs and personnel actions are administered in conformance with the principles of equal employment opportunity.

I want to take this opportunity to reaffirm the University's commitment to equal opportunity in all aspects of our daily operations, including recruitment, hiring, training and promotion in all jobs without regard to race, color, age religion, gender, sexual orientation, gender identity or expression, national origin, veteran status, disability or genetic information. Should you have questions regarding any of these policies, please feel free to contact Human Resources.

Legail Chandler
Vice Chancellor for Human Resources

sion and death. If combined with other depressants of the central nervous system, much lower doses of alcohol will produce the effects just described.

Repeated use of alcohol can lead to dependence. Sudden cessation of alcohol intake is likely to produce withdrawal symptoms, including severe anxiety, tremors, hallucinations, and convulsions. Alcohol withdrawal can be life threatening. Long-term consumption of large quantities of alcohol, particularly when combined with poor nutrition, can also lead to permanent damage to vital organs such as the brain and the liver.

Women who drink alcohol during pregnancy may give birth to infants with fetal alcohol syndrome. These infants have irreversible physical abnormalities and mental retardation. In addition, research indicated that children of alcoholic parents are at greater risk than other youngsters of becoming alcoholics.

Legal Sanctions

Drugs: The manufacture, possession, sale, distribution, and use of controlled substances are prohibited by federal, state and local law; punishments range from fines to life imprisonment.

Section 195.214 of the Missouri statutes makes it a class A felony to distribute or deliver controlled substances on or near University property. Persons convicted of this offense can be sentenced to imprisonment for not less than 10 years.

The Federal Controlled Substances Act prohibits the knowing, intentional, and unauthorized manufacture, distribution, or dispensing of any controlled substance or the possession of any controlled substance with intent to manufacture, distribute, or dispense. A detailed description of the penalties associated with illegal drug trafficking is provided in the chart, Federal Trafficking Penalties, published by the U.S. Department of Justice's Drug Enforcement Administration as found in Appendix B (pdf).

Alcohol: Missouri's Liquor Control Law makes it illegal, among other things, for a person under the age of 21 years to purchase, attempt to purchase, or possess any intoxicating liquor (R.S.Mo. Section 311.325). Violation of this provision can result in a fine between \$50 and \$1000 and/or imprisonment for a maximum term of one year. County and municipality ordinances contain similar prohibitions and sanctions.

Loss of Workers' Compensation Benefits

The Missouri Workers' Compensation Act requires the forfeiture of benefits or compensation otherwise payable to an employee when the use of alcohol or non-prescribed controlled drugs is the proximate cause of the employee's injury. At a minimum, the Act provides for a reduction in benefits or compensation when the employee is injured while using alcohol or non-prescribed controlled drugs.

Testing Requirement for Commercial Drivers Licenses (CDLs)

To meet requirements of the U.S. Department of Transportation (DOT), the University has established a drug and alcohol testing program for its employees who are drivers of its commercial motor vehicles requiring commercial drivers licenses (CDLs), and who perform safety-sensitive functions, e.g., operate a vehicle requiring the display of hazardous material placards. This drug and alcohol testing program also applies to applicants selected for hire for designated safety-sensitive positions. Participation in the drug and alcohol testing program is a condition of employment for these positions.

This program requires pre-employment drug testing as well as DOT mandated random testing of current employees who are required to have CDLs.

Questions regarding this requirement may be directed to the Designated Employee Representative for this program or to Human Resources.

Accidents Involving University-Owned Vehicles

The University reserves the right to require that an employee undergo immediate drug and/or alcohol testing if the employee is involved in a vehicular accident while driving a University-owned vehicle.

Inspections

When the University has reasonable grounds to suspect that an employee unlawfully manufactured, distributed, possessed or used controlled substances, alcohol or drug paraphernalia on University property or at any of its activities, the University reserves the right to inspect the employee's locker, desk, or other University property under the control of the employee.

The School of Medicine maintains additional requirements. For information see the School of Medicine Human Resources web site, Drug & Alcohol Policy, (<http://medschoolhr.wustl.edu/Policies/Documents/WUSM%20Drug%20and%20Alcohol%20Policy.pdf>) or contact the Executive Director for Human Resources at 362-4900.

Updated January 2016

Drug and Alcohol Policy

Introduction and Policy Statement

Washington University is committed to maintaining a safe and healthful environment for members of the University community by promoting a drug-free environment as well as one free of the abuse of alcohol. Violations of this policy will be handled according to existing policies and procedures concerning the conduct of faculty, staff and students.

This policy is adopted in accordance with the Drug-Free Workplace Act and the Drug-Free Schools and Communities Act.

Standards of Conduct

Washington University strictly prohibits the unlawful manufacture, sale, distribution, dispensation, possession or use of controlled substances or alcohol on University property or as a part of any University activity. All faculty, staff and students must comply with this policy as a condition of their employment or enrollment. Faculty and staff members are prohibited from reporting to work under the influence of alcohol, chemicals, or drugs, including legally obtained prescription drugs, which impair one's ability to perform normal work activities. All faculty and staff members must notify their immediate supervisor(s) within five (5) days of any criminal drug statute conviction for a violation occurring in the workplace or in the conduct of University business.

Violations

Violations of the standards of conduct will be dealt with on a case-by-case basis following the policies and procedures applicable to, as appropriate, faculty, staff or students. Sanctions may include, among other things, reprimand, warning, suspension, probation, expulsion or termination. Referral to an appropriate assistance or rehabilitation program also may be appropriate. Referral for prosecution will occur for serious violations.

The Drug-Free Workplace Act requires the University: (1) within 10 days after receiving notice that an employee has been convicted of any criminal drug statute violation occurring in the workplace or in the conduct of University business, to notify appropriate government agencies of such conviction; and (2) within 30 days after receiving such notice, to take appropriate personnel action against such

employee up to and including termination and/or to require the employee to satisfactorily participate in a drug abuse assistance or rehabilitation program.

Drug and Alcohol Counseling, Treatment or Rehabilitation or Re-Entry Programs

Early recognition and treatment of drug or alcohol abuse are important for successful rehabilitation, and for reduced personal, family and social disruption. Washington University encourages the earliest possible diagnosis and treatment for drug and alcohol abuse, however, the decision to seek diagnosis and accept treatment for drug or alcohol abuse is the responsibility of the individual.

The University encourages faculty, staff and students to seek assistance in dealing with a substance abuse problem, or those problems of a family member, by contacting available resources. University resources include Student Health Services (Danforth Campus, 314-935-6666); Student and Employee Health (School of Medicine, 314-362-3523), the Psychological Service Center (314-935-6555), the Department of Psychiatry (314-362-7002), and the Employee Assistance Program (1-800-765-9124).

Numerous non-University counseling programs exist in the St. Louis metropolitan area. Many programs advertise extensively in local media. Consultation with one's personal physician is advised prior to self-referral to such non-University programs. For further information regarding referral to such programs, contact Student Health Services, the School of Medicine Student and Employee Health, or your private physician.

Health Risks

Drugs: A detailed description of the health risks associated with abuse of controlled substances is provided in the chart, Drug Uses and Effects, published by the U.S. Department of Justice's Drug Enforcement Administration as found in Appendix A (pdf).

Alcohol: Abuse of alcohol can produce severe health risks, including death. Alcohol consumption causes a number of marked changes in behavior. Even low doses significantly impair the judgment and coordination required to drive a car safely, increasing the likelihood that the driver will be involved in an accident. Low-to-moderate doses of alcohol also increase the incidence of a variety of aggressive acts, including spouse and child abuse. Moderate-to-high doses of alcohol cause marked impairments in higher mental functions, severely altering a person's ability to learn and remember information. Very high doses cause respiratory depres-

Washington University Policies

Policy on Sexual Harassment

Introduction and Policy Statement

Washington University is committed to having a positive learning and working environment for its students, faculty and staff and will not tolerate sexual harassment.

Sexual harassment is an attack on the dignity of individuals and the integrity of the University as an institution of learning. Academic freedom can exist only when every person is free to pursue ideas in a non-threatening, non-coercive atmosphere of mutual respect. Sexual harassment is reprehensible and threatening to the careers, educational experience and wellbeing of all members of our community.

Sexual harassment is a form of discrimination that violates University policy. It is also illegal under state and federal law.

This policy applies to all members of the Washington University community. It allocates responsibilities for helping to ensure that University policy is fairly applied, explains the process by which complaints of sexual harassment may be brought forward and provides sanctions for sexual harassment, which may range from reprimands to termination or dismissal, depending upon the severity of the offense. If you believe you have been sexually harassed, Sections IV and V describe options about what you can do and where you can get help. If you believe you have been falsely accused of sexual harassment, the procedures described below are also available to you. Those charged with implementation of this Policy will, whenever appropriate, encourage and assist individuals who believe they may have been sexually harassed to pursue the assorted means outlined in the policy for securing the cessation of unwelcome and offensive conduct.

What is Sexual Harassment?

For the purposes of this statement, Washington University has adapted the Equal Employment Opportunity Commission (EEOC) definition of sexual harassment for an academic community: Sexual harassment is defined as any unwelcome sexual advance, request for sexual favor or other unwelcome verbal or physical conduct of a sexual nature, including sexual violence, whether committed on or off campus, when:

1. submission to such conduct is made, either explicitly or implicitly, a term or condition of an individual's employment or academic advancement;
2. submission to or rejection of such conduct by an individual is used as the basis or threatened to be used as the basis for employment or academic decisions or assessments affecting an individual; or
3. such conduct has the purpose or effect of unreasonably interfering with an individual's work or educational performance or creating an intimidating or hostile environment for work or learning. Such conduct will typically be directed against a particular individual or individuals and will either be abusive or severely humiliating or will persist despite the objection of the person targeted by the speech or conduct.

Sexual violence is a prohibited form of sexual harassment and includes physical sexual acts perpetrated against a person's will or where it would be apparent to a reasonable observer that a person is incapable of giving consent due to the victim's use of drugs and/or alcohol or due to an intellectual or other disability.

Sexual harassment includes but is not limited to situations where one person has authority over another. In such situations, sexual harassment is particularly serious because it may unfairly exploit the power inherent in a faculty member's or supervisor's position.

Sexual harassment can be verbal, visual, physical or communicated in writing or electronically. Some conduct obviously constitutes sexual harassment -- such as a threat that a grade or promotion will depend on submission to a sexual advance. But whether particular conduct constitutes sexual harassment will often depend upon the specific context of the situation, including the participants' reasonable understanding of the situation, their past dealings with each other, the nature of their professional relationship (e.g., supervisor-subordinate, colleague, etc.) and the specific setting. The inquiry can be particularly complex in an academic community, where the free and open exchange of ideas and viewpoints preserved by the concept of academic freedom may sometimes prove distasteful, disturbing or offensive to some.

Examples of conduct which may constitute sexual harassment include but are not limited to:

requests for sexual favors

hugging, rubbing, touching, patting, pinching or brushing another's body

inappropriate whistling or staring

veiled suggestions of sexual activities

requests for private meetings outside of class or business hours for other than legitimate mentoring purposes

use in the classroom of sexual jokes, stories or images in no way germane to the subject of the class

remarks about a person's body or sexual relationships, activities or experience

use of inappropriate body images to advertise events

sexual violence, including but not limited to rape, sexual assault, sexual battery, and sexual coercion

Members of the University community can expect to be free from sexual harassment and thus all members of the University community should guard against it. The fact that someone did not intend to sexually harass an individual is generally not considered a sufficient defense to a complaint of sexual harassment, although the reasonableness or the accuser's perceptions may be considered. In most cases, it is the effect and characteristics of the behavior on the complainant and whether a reasonable person similarly situated would find the conduct offensive that determine whether the behavior constitutes sexual harassment.

Confidentiality

The University will strive to protect, to the greatest extent possible, the confidentiality of persons reporting harassment and of those accused of harassment. Because the University has a legal obligation to address sexual harassment, however, the University cannot guarantee complete confidentiality where it would conflict with the University's obligation to investigate meaningfully or, where warranted, take corrective action. Even when some disclosure of the University's information or sources is necessary, it will be limited to the extent possible. The University will, to the extent permitted by law, keep confidential all records of complaints, responses and investigations. The records maintained by the Sexual Harassment Response Coordinator shall be available only to the Coordinator and, to the extent necessary, to administrators and other supervisors charged with responding to allegations of harassment. Allegations of sexual harassment shall not be placed in student records or personnel files unless, after appropriate investigation, such allegations have been sustained. Records of allegations maintained by the Coordinator which do not lead to formal hearings or personnel actions will be discarded after five years unless there are additional, more recent complaints against the same person. Any records maintained by the Coordinator concerning an allegation about which an accused person was not given reasonably timely notice and an opportunity to respond shall not be used to justify or enhance a sanction, other than an oral or written warning, imposed for a different instance of harassment.

If you want to discuss possible harassment in a more confidential setting or clarify your feelings about whether and how you wish to proceed, you may want to consult a social worker, therapist or member of the clergy, who is permitted, by law, to assure greater confidentiality. Clergy and counseling resources on campus are listed in Bearings, Ternion, and the University's Safety and Security brochure available at www.police.wustl.edu. In addition, any member of the University community may contact the Student Counseling Services at 935-5980 for a confidential discussion and, if desired, referral to off-campus resources.

Seeking Advice; Making a Complaint

If you believe that you have been sexually harassed, you have a number of response options, both formal and informal. Some people may wish to pursue informal means instead of or before making a formal complaint; others will not. If an informal procedure is ineffective, the formal procedures will remain open to you. You should select the route you feel most appropriate for your circumstances. However you wish to proceed, you may consult at any time with the University's Title IX Sexual Harassment Response Coordinator or Advisors (listed in the Appendix), whose responsibilities include assisting students, faculty and staff with sexual harassment issues, be they general or specific, formal or informal. You may wish to work with the Coordinator or Advisors to select an approach.

Informal Procedures

If you feel comfortable dealing with the situation without assistance, you can:

1. Clearly say "no" to the person whose behavior is unwelcome.
2. Communicate either orally or in writing with the person whose behavior is unwelcome. The most useful communication will have three parts:
 - A factual description of the incident(s) including date, time, place and specific action.
 - A description of the writer's feelings, including any consequences of the incident.
 - A request that the conduct cease.

Frequently, such a communication will cause the unwelcome behavior to stop, particularly where the person may not be aware that the conduct is unwelcome or offensive.

If you would like to proceed informally, but with the assistance of someone else, you may:

1. Ask the person's supervisor, e.g., department chair, dean, director, housing office representative, academic advisor or resident advisor, to speak to the person whose behavior was unwelcome. The purpose of such conversations is the cessation of unwelcome behavior.
2. Consult with the Coordinator or one of the Sexual Harassment Response Advisors listed in the Appendix and specifically charged with responding to sexual harassment inquiries and complaints.
3. These individuals are thoroughly familiar with University policy on sexual harassment and are available to consult with victims of sexual harassment, those charged with sexual harassment, witnesses and supervisors of parties to a complaint. They can provide information about informal actions that might remedy the situation and discuss University policy on sexual harassment and procedures for resolving complaints.
4. With the exception of allegations of sexual violence, ask the Coordinator to mediate or arrange for mediation. Mediation is discussion and negotiation, with the help of a third party, designed to permit the parties to reach a mutually agreeable resolution of a dispute. If a person complaining of sexual harassment seeks mediation, the person accused of harassment agrees and the Coordinator concludes that the mediation would be consistent with the University's legal obligations in responding to and preventing sexual harassment, the Coordinator may mediate or arrange for mediation.

Formal Procedures

Whether or not you have attempted to resolve a sexual harassment claim through informal means, you may initiate a formal sexual harassment grievance proceeding by filing a written complaint. This process may lead to a formal hearing at which evidence will be considered and witnesses heard. If this is the course you wish to take, the Coordinator can assist you in filing a complaint.

Complaints, prepared with or without the assistance of the Coordinator, can be filed with the following Committees, with a copy to the Coordinator for your campus:

Complaints against faculty or staff:

- Discrimination, Discriminatory or Sexual Harassment Grievance Committee (complaints by faculty and administrators)
- Discriminatory Harassment and Title IX Grievance Committee (complaints by students)
- Human Resources Advisory Committee (complaints by staff)

All of these committees may be contacted at:

c/o Office of Human Resources
North Brookings Hall, Room 126
Campus Box 1184
935-5990

Hearing procedures are set forth in the Washington University Discrimination and Sexual Harassment Hearing Procedures. These procedures may be obtained from the Office of Human Resources or from any Sexual Harassment Response Coordinator or Advisor.

Note that complaints against a student or student groups alleging sexual violence are governed by the University Sexual Assault Investigation Board policy available on line at: <http://www.wustl.edu/policies/sexualassault.html>

Complaints against students or student groups:

Office of the Judicial Administrator
Residential Life Center
South 40 House
Campus Box 1250
935-4174
935-7776 (fax)

Hearing procedures for complaints alleging sexual harassment that does not involve sexual violence are set forth in the University Judicial Code, which can be found in the Washington University Faculty Information Handbook and online: <http://www.wustl.edu/policies/judicial.html>. These procedures may also be obtained from the University Judicial Administrator or from the Title IX Sexual Harassment Response Coordinator or Advisors. The procedures for complaints against students alleging sexual violence are set forth in the University Sexual Assault Investigation Board policy, available on line at: <http://www.wustl.edu/policies/sexualassault.html>

Whether or not you choose to file a complaint, the University may be required, or may otherwise deem it necessary and protective of the University community, to commence its own investigation and hearing procedure.

Washington University Policies

Inquiries regarding Title IX may be referred to the:

University's Title IX Sexual Harassment Response Coordinator
Jessica Kennedy
Ann W. Olin Women's Building, Room 308
Campus Box 1167
jwkennedy@wustl.edu

or to the:

United States Department of Education
Office of Civil Rights
400 Maryland Avenue, S.W.
Washington, DC 20202-1100
www.ed.gov

Protection of Rights

The University will not tolerate retaliation or discrimination against persons who report or charge sexual harassment or against those who testify, assist or participate in any investigation, proceeding or hearing involving a complaint of sexual harassment. In this context, retaliation means speech or conduct that adversely affects another's terms or conditions of employment or education and is motivated by an intent to harm the targeted person because of his or her participation in the filing or investigation of an allegation of sexual harassment. Any such retaliation -- or any encouragement of another to retaliate -- is a serious violation of University policy and law; independent of whether the particular claim of sexual harassment is substantiated. If you believe you have been subjected to retaliation in violation of this rule, you may use the procedures described above to complain and seek redress.

The University seeks to protect the rights of all persons, accusers and accused, to fair procedures. Accusations of sexual harassment typically have injurious far-reaching effects on the careers and lives of accused individuals. Allegations of sexual harassment must be made in good faith and not out of malice. Knowingly making a false or frivolous allegation of sexual harassment, whether in a formal or informal context, will be treated as a serious offense under this policy and, where it applies, the University Judicial Code. If you believe you have been falsely accused of sexual harassment you may use the procedures of this policy or the University Judicial Code, where applicable, to seek redress. See Section IV.

Obligations of Vigilance and Reporting

The University can respond to specific instances and allegations of harassment only if it is aware of them. The University therefore encourages anyone who believes that he or she has experienced sexual harassment to promptly come forward

with inquiries, reports or complaints and to seek assistance from the University. In addition, any University employee who becomes aware of instances or allegations of sexual harassment by or against a person under his or her supervisory authority must report it to those charged with responding to such allegations and reports: the appropriate dean, director or department head or other similar administrator or to the Sexual Harassment Response Coordinator or one of the Advisors. It shall be the responsibility of these individuals to respond to allegations and reports of sexual harassment or refer them to other University officials for such response.

Any dean, director or department head or other similar administrator who becomes aware of information indicating a significant likelihood of sexual harassment must report such information to the Title IX Sexual Harassment Response Coordinator. These administrators must respond not only when they receive a specific complaint or report alleging improper activity, but also when such matters come to their attention informally. Unconfirmed or disputed allegations should be clearly labeled as such and reports should indicate any steps already taken to investigate or otherwise respond. Administrators may wish to consult with the Coordinator or any of the Advisors prior to investigating or otherwise responding to any situation involving alleged harassment.

Possible Sanctions

Possible sanctions for a person found guilty of behavior in violation of this policy include but are not limited to the following:

- oral or written reprimand, placed in the personnel file
- required attendance at a sexual harassment sensitivity program
- an apology to the victim
- oral or written warning
- loss of salary or benefit, such as sabbatical or research or travel funding
- transfer or change of job, class or residential assignment or location (i.e., removing the person from being in a position to retaliate or further harass the victim.)
- fine
- demotion
- suspension, probation, termination, dismissal or expulsion

While counseling is not considered a sanction, it may be offered or required in combination with sanctions. Where alcohol is involved in the sexual harassment, such counseling may include an alcohol abuse program.

If students or student groups are guilty of sexual harassment, any of the sanctions set forth in the University Judicial Code may also be invoked.

Education

The best way to deal with sexual harassment is to prevent it. Education is essential to eliminating sexual harassment. To this end, Washington University has developed an ongoing training program. Please call a Sexual Harassment Response Coordinator or Advisor to find out more about these programs, what sexual harassment is, how to respond to it and what to do when someone asks for advice about sexual harassment.

Approved by the Washington University Senate Council, October 19, 1995.

Approved by the Washington University Senate, April 22, 1996. Revision approved by the Washington University Senate, April 28, 1997.

Revision approved by the Washington University Faculty Senate Council, November 15, 2011; modified per Title IX Dear Colleague Letter clarifications.

Policy updated to be consistent with the University Sexual Assault Investigation Board policy, January 25, 2013.

(This policy supersedes prior University Policies on Sexual Harassment).

Appendix: Title IX Coordinator/Sexual Harassment Coordinator and Advisors (as of July 2014)

Danforth Campus

| Name | Complaints Handled | Contact Number |
|---------------------|---------------------------|----------------|
| <i>Coordinator:</i> | | |
| Sara Wright | Faculty, staff and others | 935-3147 |

School of Medicine Campus

| Name | Complaints Handled | Contact Number |
|---------------------|---------------------------|----------------|
| <i>Coordinator:</i> | | |
| Leanne Stewart | Faculty, staff and others | 362-8278 |

Title IX Coordinator on both campuses

| Name | Complaints Handled | Contact Number |
|---------------------|-----------------------------|----------------|
| <i>Coordinator:</i> | | |
| Jessica Kennedy | Faculty, staff and students | 935-3118 |

Washington University Code of Conduct

Statement of general principles

This code applies to the following members of the Washington University in St. Louis community:

- individuals who are paid by Washington University when they are working for the university—this category includes: faculty and staff;
- consultants, vendors and contractors when they are doing business with the university; and
- individuals who perform services for the university as volunteers.

The Code of Conduct refers to all these persons collectively as “members of the university community” or “community members.”

Integrity and Ethical Conduct

Washington University is committed to the highest ethical and professional standards of conduct as an integral part of its mission, the promotion of learning. To achieve this goal, the university relies on each community member's ethical behavior, honesty, integrity and good judgment. Each community member should demonstrate respect for the rights of others. Each community member is accountable for his/her actions.

This Code of Conduct describes standards to guide us in our daily university activities, standards we believe are already being followed.

Compliance with laws and university policies

The university and each community member must transact university business in compliance with all laws, regulations and university policies related to their positions and areas of responsibility. Managers and supervisors are responsible for teaching and monitoring compliance in their areas.

Procedures for reporting violations or concerns

The university's compliance effort focuses mainly on teaching members of the university community the appropriate compliance standards for the areas in which they work. Nevertheless, violations may occur. In addition, members of the university community may have concerns about

matters that they are not sure represent violations. This section describes community members' responsibilities for reporting violations or concerns, and how these responsibilities may be carried out.

Each community member is expected to report violations or concerns about violations of this Code of Conduct that come to his/her attention. Managers have a special duty to adhere to the standards set forth in this Code of Conduct, to recognize violations and to enforce the standards. Disciplinary actions for proven violations of this Code, or for retaliation against anyone who reports possible violations, will be determined on a case-by-case basis and may include termination of employment. Individuals who violate the Code may also be subject to civil and criminal charges in some circumstances.

How to Report a Violation or Discuss a Concern

You may report violations or concerns to your immediate supervisor or department head, if appropriate. You may also call the University Compliance Hotline at the number established for this purpose: (314) 362-4998. Reports may be made anonymously to this number, if the caller so desires. This telephone line has no caller identification or number recognition.

The **Online Reporting Form** can also be used to report violations or concerns.

For matters dealing with one of the specific areas below, you may call the number indicated, or you may call the University Compliance Office at (314) 362-4909.

Animal Care Issues

Jennifer Lodge, Vice Chancellor for Research
(314) 747-0515

Computer Use & Security Policies

John Gohsman, Vice Chancellor and Chief Information Officer
(314) 935-7391
Kevin Hardcastle, Chief Information Security Officer
(314) 935-7986
Michael Caputo, Asst. Dean-Chief Information Officer, Medical Computing Services
(314) 747-4343

Conflict of Interest Issues - Research

Jennifer Lodge, Vice Chancellor for Research
(314) 747-0515

Conflict of Interest - Clinical and Physician Relationship with Drug and Medical Equipment or Device Companies

Dr. James Crane, Assoc. Vice Chancellor for Clinical Affairs
(314) 362-6249

Conflict of Interest - Procurement

Alan Kuebler, Asst. Vice Chancellor for Resource Mgt.
(314) 935-5727

Environmental Health and Safety

Bruce Backus, Asst. Vice Chancellor for Environmental Health & Safety
(314) 362-6816

HIPAA (Health Insurance Portability and Accountability Act)

HIPAA Privacy Issues
Sondra Hornsey, Privacy Officer
(314) 747-4975
HIPAA Security Issues
Kevin Hardcastle, Chief Information Security Officer
(314) 935-7986

Human Studies

Jennifer Lodge, Vice Chancellor for Research
(314) 747-0515

Finance

Amy Kveskin, Vice Chancellor for Finance & CFO
(314) 935-9842

Human Resources/Personnel Issues

Danforth Campus, West Campus, North Campus
Legail Chandler, Vice Chancellor for Human Resources
(314) 935-7746
Medical School
Leanne Stewart, Director- Medical School Human Resources
(314) 362-4900

Physician and Medical Professional Billing

Jane Ditch, Director of Physician Billing Compliance
(314) 747-7660

Research Financial Management

Jennifer Lodge, Vice Chancellor for Research
(314) 747-0515

Research Integrity

Jennifer Lodge, Vice Chancellor for Research
(314) 747-0515

Washington University Policies

Discrimination and Discriminatory Harassment Policy

Policy Statement

Washington University is committed to having a positive learning and working environment for its students, faculty, and staff. University policy prohibits discrimination on the basis of race, color, age, religion, gender, sexual orientation, gender identity or expression, national origin, veteran status, disability or genetic information. Harassment based on any of these classifications is a form of discrimination and also violates University policy and will not be tolerated. In some circumstances such discriminatory harassment may also violate federal, state or local law.

In 1996, the University adopted a new Policy on Sexual Harassment. Since that time, allegations of discrimination or discriminatory harassment on bases other than sex have been handled in a similar manner. This Policy confirms that allegations of any sort of discrimination or discriminatory harassment are subject to the same policies and procedures described in the Policy on Sexual Harassment. That Policy applies to all members of the Washington University community. It allocates responsibilities for helping to ensure that University policy is fairly applied, explains the processes by which complaints of discrimination or harassment may be brought forward, and provides sanctions, which may range from reprimands to termination or dismissal, depending on the severity of the offense. School of Medicine students and employees may, alternatively, rely on the School's Abusive Conduct Policy.

In an academic community, the free and open exchange of ideas and viewpoints reflected in the concept of academic freedom may sometimes prove distasteful, disturbing or offensive to some. Indeed, the examination and challenging of assumptions, beliefs or viewpoints that is intrinsic to education may sometimes be disturbing to the individual. Neither the Policy on Sexual Harassment nor this Policy is intended to compromise Washington University's traditional commitment to academic freedom or to education that encourages students to challenge their own views of themselves and the world.

This Policy is published in many places, including the Record, and the Faculty Information Handbook. It may also be found at <http://hr.wustl.edu/policies/Pages/DiscriminationAndDiscriminatoryHarassment.aspx> or obtained from the Danforth or Medical School Human Resources office.

What is Discriminatory Harassment?

Discriminatory harassment is unwelcome and objectively offensive conduct that (a) has the purpose or effect of unreasonably interfering with an individual's work or educational environment, (b) is directed at a particular individual or individuals because of the individual's/individuals' race, color, age, religion, gender, sexual orientation, gender identity or expression, national origin, veteran status, disability or genetic information, and (c) is abusive or severely humiliating. Some conduct obviously constitutes harassment, such as a statement that all members of a disfavored group will be required to work in the basement because their supervisor does not, on the basis of their group membership, want to be near them. Whether particular conduct constitutes harassment often depends on the specific context of the situation, including the participants' reasonable understanding of the situation, their past dealings with each other, the nature of their professional relationship (for example, supervisor-subordinate, colleague), and the specific setting.

Confidentiality

The University will strive to protect, to the greatest extent possible, the confidentiality of persons reporting harassment and of those accused of harassment. Because the University has an obligation to address harassment, however, the University cannot guarantee complete confidentiality where it would conflict with the University's obligation to investigate meaningfully or, where warranted, take corrective action. Even when some disclosure of the University's information or sources is necessary, it will be limited to the extent possible. The University will, to the extent permitted by law, keep confidential all records of complaints, responses and investigations. The records maintained by the Harassment Response Coordinator shall be available only to the Coordinator and, to the extent necessary, to administrators and other supervisors charged with responding to allegations of harassment. Allegations of harassment shall not be placed in student records or personnel files unless, after appropriate investigation, such allegations have been sustained. Records of allegations maintained by the Coordinator, which do not lead to formal hearings, or personnel actions will be discarded after five years unless there are additional, more recent complaints against the same person. Any records maintained by the Coordinator concerning an allegation about which an accused person was not given reasonably timely notice and an opportunity to respond shall not be used to justify or enhance a sanction, other than an oral or written warning, imposed for a different instance of harassment.

If you want to discuss possible discrimination or harassment in a more confidential setting or clarify your feelings about whether and how you wish to proceed, you may want to consult a social worker, therapist or member of the clergy, who is permitted, by law, to assure greater confidentiality. Clergy and counseling resources on campus are listed in Safety and Security on the Danforth Campus. In addition, any member of the University community may contact the Student Counseling Services at 935-5980 for a confidential discussion and, if desired, referral to off-campus resources.

Seeking Advice; Making a Complaint

If you believe that you have been discriminated against or harassed, you have a number of response options, both formal and informal. Some people may wish to pursue informal

means instead of or before making a formal complaint; others will not. If an informal procedure is ineffective, the formal procedures will remain open to you. You should select the route you feel most appropriate for your circumstances. However you wish to proceed, you may consult at any time with the Danforth or Medical Center Discrimination and Discriminatory Harassment Response Coordinator or Advisors (listed in the Appendix), whose responsibilities include assisting students, faculty and staff with harassment issues, be they general or specific, formal or informal. You may wish to work with the Coordinator or Advisors to select an approach.

Informal Procedures

If you feel comfortable dealing with the situation without assistance, you can communicate either orally or in writing with the person whose behavior is offensive. The most useful communication will have three parts:

1. A factual description of the incident(s) including date, time, place and specific action.
2. A description of the writer's feelings, including any consequences of the incident.
3. A request that the conduct cease.

Frequently, such a communication will cause the offensive behavior to stop, particularly where the person may not be aware that the conduct is offensive.

If you would like to proceed informally, but with the assistance of someone else, you may:

1. Ask the person's supervisor, e.g., department chair, dean, director, housing office representative, academic advisor or resident advisor, to speak to the person whose behavior was offensive. The purpose of such conversations is the cessation of offensive behavior. You should note that these individuals may be obligated to report the incident or conduct you disclose to the University for further investigation and action.
2. Consult with the Coordinator or one of the Advisors listed in the Appendix and specifically charged with responding to discrimination and harassment inquiries and complaints. These individuals are thoroughly familiar with University policy on discrimination and harassment and are available to consult with victims, those accused of engaging in discrimination or harassment, witnesses and supervisors of parties to a complaint. They can provide information about informal actions that might remedy the situation and discuss University policy on discrimination and harassment and procedures for resolving complaints.
3. Ask the Coordinator to mediate or arrange for mediation. Mediation is discussion and negotiation, with the help of a third party, designed to permit the parties to reach a mutually agreeable resolution of a dispute. If a person complaining of discrimination or discriminatory harassment seeks mediation, the person accused of discrimination or discriminatory harassment agrees and the Coordinator concludes that the mediation would be consistent with the University's legal obligations in responding to and preventing discrimination or discriminatory harassment, the Coordinator may mediate or arrange for mediation.

Formal Procedures

Whether or not you have attempted to resolve a discrimination or discriminatory harassment claim through informal means, you may initiate a formal discrimination or discriminatory harassment grievance proceeding by filing a written complaint. This process may lead to a formal investigation and hearing at which evidence will be considered and witnesses heard. If this is the course you wish to take, the Coordinator can assist you in filing a complaint.

Complaints, prepared with or without the assistance of the Coordinator, can be filed with the Vice Chancellor for Human Resources, who will then forward it to the appropriate Committee below, generally within seven days of receipt of the Complaint, with a copy to the Coordinator.

Once the Complaint is forwarded to the appropriate Committee, the Committee will begin its investigation and hearing to determine whether it is more likely than not that the Respondent has violated this Discrimination and Discriminatory Harassment Policy and to make recommendations to the University administration regarding sanctions or disciplinary action.

Complaints against faculty or staff:

- Discrimination, Discriminatory or Sexual Harassment Grievance Committee (faculty and administrators)
- Discrimination and Title IX Grievance Committee (students)
- Human Resources Advisory Committee (staff)

All of these committees may be contacted at the following address:
c/o Office of Human Resources
North Brookings Hall, Room 126
Campus Box 1184
(314) 935-5990

Additional investigation and hearing procedures are set out in the Washington University Discrimination and Sexual Harassment Hearing Procedures. These procedures may be obtained from the Office of Human Resources, or from the Discrimination and Discriminatory Harassment Response Coordinator or any of the Advisors.

Complaints against students or student groups:

Director of Judicial Programs
Residential Life Center
South 40 House
Campus Box 1250
(314) 935-4174

Additional investigation and hearing procedures are set out in the University Judicial Code and Washington University Faculty Information Handbook. These procedures may also be obtained from the University Judicial Administrator or from the Discrimination and Discriminatory Harassment Response Coordinator or Advisors.

Whether or not you choose to file a complaint, the University may be required, or may otherwise deem it necessary and protective of the academic community, to commence its own investigation.

Absent special circumstances, the University will conclude its investigation and hearing of the complaint and issue a written decision notifying the parties of its decision within 60 days of the initial submission of the Complaint.

The parties may seek a review of the Committee's decision and recommendation by submitting a request for review to the Vice Chancellor for Human Resources within fourteen days of the Committee's issuance of the written decision, who will then forward it to the appropriate appeal officer for review pursuant to the additional hearing procedures referenced above.

Protection of Rights

The University will not tolerate retaliation or discrimination against persons who report or charge discrimination or discriminatory harassment or against those who testify, assist or participate in any investigation, proceeding or hearing involving a complaint of discrimination or discriminatory harassment. In this context, retaliation means speech or conduct that adversely affects another's terms or conditions of employment or education and is motivated by an intent to harm the targeted person because of his or her participation in the filing or investigation of an allegation of discrimination or discriminatory harassment. Any such retaliation -- or any encouragement of another to retaliate -- is a serious violation of University policy and law, independent of whether the particular claim of discrimination or discriminatory harassment is substantiated. If you believe you have been subjected to retaliation in violation of this rule, you may use the procedures described above to complain and seek redress.

The University seeks to protect the rights of all persons, accusers and accused, to fair procedures. Accusations of discrimination or discriminatory harassment typically have injurious far-reaching effects on the careers and lives of accused individuals. Allegations of harassment must be made in good faith and not out of malice. Knowingly making a false or frivolous allegation of discrimination or discriminatory harassment, whether in a formal or informal context, will be treated as a serious offense under this policy and, where it applies, the University Judicial Code. If you believe you have been falsely accused of discrimination or discriminatory harassment you may use the procedures of this policy or the University Judicial Code, where applicable, to seek redress.

A Statement Regarding Title IX

Title IX of the Education Amendments of 1972 prohibits discrimination (including sexual harassment and sexual violence) based on sex in the University's educational programs and activities. Title IX also prohibits retaliation for asserting claims of sex discrimination. The University has designated the Discrimination and Discriminatory Harassment Coordinator and Advisors identified below to coordinate our compliance with and response to inquiries concerning Title IX. You may also submit a complaint or inquiry regarding Title IX by contacting the United States Department of Education's Office of Civil Rights at 400 Maryland Avenue, S.W. Washington, DC 20202-1100 or by visiting www2.ed.gov or calling 1-800-421-3481.

At any point before, during or after an investigation and regardless of the Committee's final decision, the Title IX Coordinator may determine that interim or remedial measures directed at the parties, witnesses or a broader University population are necessary and appropriate to prevent and/or respond to sexual harassment or sexual violence.

Approved by the Washington University Faculty Senate Council, November 25, 2002

Approved by the Washington University Faculty Senate, December 19, 2002

Approved by the Washington University Faculty Senate Council, November 29, 2007

Approved by the Washington University Faculty Senate, December 12, 2007

Updated September 2009 (compliance with Genetic Information Nondiscrimination Act, H.R. 493)

Updated July 2013 (consistent with Title IX)

Appendix

Updated July 2004

Updated September 2005

Updated August 2008

Updated October 2010

Appendix: Discrimination and Discriminatory Harassment Coordinators and Advisors (as of July 2014)

Danforth Campus

| Name | Complaints Handled | Contact Number |
|-------------|---------------------------|----------------|
| | <i>Coordinator:</i> | |
| Sara Wright | Faculty, staff and others | 935-3147 |

School of Medicine Campus

| Name | Complaints Handled | Contact Number |
|----------------|---------------------------|----------------|
| | <i>Coordinator:</i> | |
| Leanne Stewart | Faculty, staff and others | 362-8278 |

Title IX Coordinator on both campuses

| Name | Complaints Handled | Contact Number |
|-----------------|-----------------------------|----------------|
| | <i>Coordinator:</i> | |
| Jessica Kennedy | Faculty, staff and students | 935-3118 |

¹This Policy is published in many places, including *Bearings*, the *Record*, and the *Faculty Information booklet*. It may also be found at wustl.edu/policies/sexharas.html or obtained from the Danforth or Medical School Human Resources office.