



# **Discrimination, Harassment, and Abusive Behavior Policy**

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# Contents

|       |  |    |
|-------|--|----|
| I.    | Statement: Objectives and Purpose                          | 4  |
| II.   | Policy Application   | 5  |
| III.  | Definitions  | 6  |
| A.    | Definition of Discrimination                               | 6  |
| B.    | Definition of Illegal Harassment                           | 6  |
| C.    | Definition of Abusive Behavior                             | 8  |
| IV.   | Retaliation  | 9  |
| V.    | Duties of Members of the TTIC Community                    | 10 |
| VI.   | Dealing with Discriminatory, Harassing or Abusive Behavior | 10 |
| A.    | Discussion Between the Parties                             | 10 |
| B.    | Confidential Support Counseling                            | 10 |
| VII.  | Filing a Complaint   | 11 |
| A.    | TTIC Complaint Procedures                                  | 11 |
| B.    | Additional Resources for Filing Discrimination Complaints  | 15 |
| C.    | Disciplinary Sanctions                                     | 15 |
| D.    | Malicious and False Accusations                            | 16 |
| E.    | Conflict of Interest                                       | 16 |
| F.    | Documentation  | 16 |
| VIII. | Confidentiality  | 17 |

## **I. Statement: Objectives and Purpose**

Toyota Technological Institute at Chicago (“TTIC” or “The Institute”) is a community of scholars dedicated to research, academic excellence, and the pursuit and cultivation of learning. Members of the TTIC community cannot thrive unless each is accepted as an autonomous individual and is treated without regard to characteristics irrelevant to participation in the life of the Institute. TTIC is committed to providing a respectful and positive environment for all members of its community. TTIC strives to provide an educational and working environment for all students, faculty, and staff that is free from all forms of harassment, discrimination, and abusive behavior. These behaviors compromise the integrity of the Institute, are an attack on core TTIC values, and inhibit fulfillment of the Institute’s mission; they are strictly prohibited.

This policy aims to protect the dignity, safety, and legal rights of TTIC community members, clarifies expectations of behavior, and describes the services available and actions to be taken should a violation of the policy occur. Members of the TTIC community who believe they have been subjected to or have witnessed a violation of this policy are strongly encouraged to file a complaint, as outlined in Section VII. TTIC will promptly investigate all reported incidents of abusive behavior, harassment and discrimination based on a legally protected status as defined in Section III, and make every attempt to provide appropriate remedies for victims of an incident. Individuals who engage in such conduct may be subject to disciplinary action. Retaliation against any person who reports behavior they believe to be in violation of this policy or who cooperates in an investigation is strictly prohibited by this policy, and individuals who engage in retaliatory conduct are subject to disciplinary action.

This policy is designed to:

- Reaffirm TTIC's commitment to providing an open and supportive environment for study and work free from illegal harassment, illegal discrimination, and abusive behavior;
- Provide notice to members of the TTIC community of the kind of conduct that is expected and what conduct is prohibited;
- Inform victims of illegal harassment, illegal discrimination, and abusive behavior of their options and rights;
- Inform members of the TTIC community about the procedures available at TTIC for addressing, investigating, and resolving complaints;
- Protect the rights and confidentiality of all parties to complaints to the fullest extent possible;
- Prohibit retaliation against persons alleging illegal harassment, illegal discrimination, or abusive behavior, and against persons cooperating in an investigation.

In order to further the goals set out above, TTIC conducts training in the prevention and reporting of harassment and discrimination, in accordance with state, federal and local

law. This includes annual training in sexual harassment prevention for employees and supervisors, and bystander training in accordance with federal, state and local law.

This policy is to be construed within the context of TTIC's commitment to academic freedom, freedom of expression, and the conception of TTIC as a place that must encourage and foster the free expression of ideas, beliefs and opinions, however unpopular. The policy is not intended to constitute a general civility code addressing ordinary stresses of the workplace, such as occasionally insensitive language or behavior.

Nothing in this policy is intended to restrict employees from engaging in protected concerted activities under Section 7 of the National Labor Relations Act.

This policy is written in accordance with federal and state laws and regulations, which are subject to amendment. To the extent this policy becomes inconsistent with such amendments, the applicable provision of Federal or state law shall supersede this policy.

Sexual Harassment that occurs within TTIC's Education Programs and Activities and that is committed by an administrator, faculty member, staff, student, contractor, guest, or other member of the TTIC community is covered under TTIC's Sexual Harassment Policy; any report and/or formal complaint related to those issues will be investigated and resolved according to the procedures in the Sexual Harassment Policy, even if the and/or formal complaint is initially filed under this policy or another policy. This policy applies to Sexual Harassment that occurs off-campus, in a private setting, or outside the scope of TTIC's Education Programs and Activities, including gender/sex-based discrimination.

## **II. Policy Application**

TTIC strictly prohibits acts of discrimination or harassment on the basis of legally protected characteristics, and abusive behavior, including behavior/incidents occurring through electronic media, whether by students, faculty, staff, contractors, or visitors:

- On TTIC grounds;
- At TTIC-sponsored or related events on and off TTIC grounds;
- In any vehicle used for TTIC business;
- Using TTIC network, email and internet services;
- Through the use of any electronic devices owned by TTIC, leased by TTIC or used for TTIC business;
- Off TTIC grounds or through the use of any electronic devices not owned or leased by TTIC, if the acts substantially interfere with the targeted individual's ability to participate in or benefit from the services, activities, or privileges provided by TTIC.

TTIC recognizes that students who have consumed alcohol when they are not twenty-one years of age or who have been using illegal drugs may be hesitant to report conduct

rising under this policy perpetrated against them or others. To encourage reporting, TTIC offers amnesty to any student who reports, in good faith, an alleged violation of this policy directed at them or another person. A student who makes such a report will not be subject to disciplinary action by TTIC for a violation of TTIC's policies, such as underage drinking or possession or use of a controlled substance, that is related to or revealed in the course of the report or investigation, unless TTIC determines that the violation was serious and/or endangered the health or well-being of any other individual. However, TTIC reserves the right to require counseling, education, or other preventative measures to help prevent alcohol or drug violations in the future. TTIC's commitment to amnesty in these situations does not prevent action by police or other legal authorities against an individual who has illegally consumed alcohol or drugs.

### **III. Definitions**

#### **A. Definition of Discrimination**

In keeping with its long-standing traditions and policies, TTIC considers students, employees, applicants for admission or employment, and those seeking access to programs on the basis of individual merit.

In accordance with federal, state and local law, TTIC does not discriminate on the basis of sex, race, color, religion, national origin, citizenship, ancestry, age, marital status, physical or mental disability, medical condition, genetic information, pregnancy or perceived pregnancy, gender, gender identity, gender expression, sexual orientation, protected military or veteran status, or any other legally protected status. TTIC prohibits discrimination based on legally protected status with respect to all employment-related decisions, educational and admissions policies, personnel actions, and academic actions, such as work assignments, appointments, compensation, evaluations, training, benefits, layoffs, and terminations.

A non-exhaustive list of examples of discrimination include:

- A faculty member giving a student a lower grade because of the student's race;
- A staff member being terminated because of their age;
- A student with a disability who does not receive approved, reasonable academic accommodations;
- An advisor not recommending a student for a fellowship due to the student's pregnancy.

#### **B. Definition of Illegal Harassment**

Harassment on the basis of sex, race, color, religion, national origin, citizenship, ancestry, creed, age, marital status, physical or mental disability, medical condition, genetic information, pregnancy or perceived pregnancy, parental status, gender, gender identity,

gender expression, sexual orientation, protected military or veteran status, or any other legally protected status is unlawful and is a violation of this policy. Harassment is verbal or physical conduct, or conduct using technology, that is severe or pervasive and has the purpose or effect of persistent interference with an individual's work performance or educational program participation, or that creates an intimidating, hostile, or offensive work or educational environment.

Further, sexual harassment is unwelcome in the TTIC community and illegal in the City of Chicago, which defines "sexual harassment as:

"...any (i) unwelcome sexual advances or unwelcome conduct of a sexual nature or (ii) requests for sexual favors or conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment; (2) submission to or rejection of such conduct by an individual is used as the basis for any employment decision affecting the individual; or (3) such conduct has the purpose or effect of substantially interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment; or (iii) sexual misconduct, which means any behavior of a sexual nature which also involves coercion, abuse of authority, or misuse of an individual's employment position."

Harassment based on sex or gender (including same-sex harassment or harassment based on gender identity/expression) is generally governed by TTIC's Sexual Harassment Policy. However, instances of perceived harassment that do not rise to the level of sexual harassment as laid out in the Sexual Harassment Policy may be covered under this policy.

Expression occurring in an academic, educational or research context is considered a special case and is broadly protected by academic freedom. Such expression will not constitute harassment unless (in addition to satisfying the above definition) it is targeted at a specific person or persons, is abusive, and serves no bona fide academic purpose. Harassment includes peer harassment among students, staff, other academic appointees, postdoctoral researchers, faculty members, program participants, visitors, and anyone on whom TTIC formally confers a title, regardless of employment status. Harassment by a faculty member, instructor, or teaching assistant of a student over whom the individual has authority, or by a supervisor of a subordinate, is particularly serious.

Harassing behavior may involve a single serious and offensive event, or may involve persistent behavior of a less severe nature that occurs over time. Stereotyping can also be harassment; statements that demean people on the basis of a protected characteristic can contribute to a hostile work or educational environment. A person's subjective belief that behavior is intimidating, hostile, or offensive does not make that behavior harassment. The behavior must be objectively unreasonable, in other words, the conduct must create a hostile working environment that no rational person can be expected to endure.

Examples of harassing behavior based on legally protected factors include:

- Teasing, jokes, derogatory comments, or epithets about a person's protected status;
- Displaying or circulating written materials or pictures that degrade a person or group;
- Touching a person in a way that makes that person feel uncomfortable;
- A teaching assistant emailing jokes targeted at individuals of a particular race, national origin or sexual orientation to colleagues;
- An employee asks a supervisor not to touch the employee, but the supervisor continues to do so;
- An instructor humiliating a student in class by making a joke about the student's disability; or
- A student subjected to persistent comments about his/her religious garb by his/her instructor.

### **C. Definition of Abusive Behavior**

"Abusive Behavior" is any severe, pervasive, or persistent act or conduct, whether physical, electronic, or verbal, that can reasonably be predicted to:

- Place the individual in reasonable fear of physical harm to their person or property;
- Cause a substantial detrimental effect on the individual's physical or mental health;
- Substantially interfere with the individual's academic/employment performance or attendance; or
- Substantially interfere with the individual's ability to participate in or benefit from the services, activities, or privileges provided by TTIC.

While abusive behavior that is not related to a legally protected status is not unlawful, it is contrary to the core principles of TTIC and is a violation of this policy.

Behavior will not be considered abusive unless it is targeted at a specific person or persons, is found to be abusive and unreasonable through the investigation process outlined in Section VII, Filing a Complaint, and serves no bona fide academic or employment purpose.

Examples of abusive behavior may include, but are not limited to, the following:

- The use of physical force or violence to restrict the freedom or movement of another person or to endanger the health or safety of another person;
- Physical or verbal behavior or threats, either express or implied, that have the reasonably foreseeable effect of interfering with an individual's personal safety, academic efforts, professional efforts, or participation in TTIC-sponsored activities;

- Epithets, slurs, or derogatory comments;
- Deliberate sabotage of the work of a colleague, subordinate, student, or co-worker;
- Abuse, humiliation, or degradation that is severe, pervasive or persistent, whether the behavior occurs in public or private;
- Regular threat of dismissal from either employment or academic program for reasons unrelated to academic or professional performance;
- Maliciously spreading damaging false information about a colleague, subordinate, student or co-worker's personal or professional accomplishments or experiences.

Investigations will take into account severity, frequency, and similar factors when investigating claims of this nature, including any documentation of previous actions taken by the Claimant or Respondent.

Examples of activities usually NOT considered abusive behavior include:

- Administrative/Advisory actions like performance reviews (including negative performance reviews) and making work assignments in educational or employment settings;
- Work-related decisions like moving work areas or changing work colleagues;
- Isolated incidents (unless, as noted above, they are very severe or involve the use of physical force).
- Constructive criticism

#### **IV. Retaliation**

Retaliation is prohibited against any individual who reports discrimination, harassment or abusive behavior, provides information about such an act, or witnesses such an act. No faculty member, administrator or staff, applicant for employment, or student may be subject to retaliation for action taken in good faith: to seek advice concerning a discrimination, harassment or abusive behavior matter; to file a complaint; or to serve as a witness or a panel member in the investigation or adjudication of a complaint. Retaliation may be found in cases in which the initial complaint is not found to be a violation of this policy, if the claim was made in good faith.

It shall not be retaliation, however, for an accused to defend himself/herself through the Resolution Procedures described in Section VII of this policy against a charge of abusive behavior under this policy; nor shall it be considered retaliation to discipline an individual for false and malicious accusations (as determined after investigation) as set forth in Section VIII.

Retaliation claims will be decided through the same resolution procedures as outlined in Section VII, Filing a Complaint. The Investigator will take into account any evidence that confirms or refutes a claim of retaliation, for example, documentation detailing a staff



member's declining performance. Retaliation, if established, may result in disciplinary action against the offending party up to and including dismissal/expulsion/termination from TTIC.

Retaliation against a person reporting or participating in an investigation into sexual harassment is illegal in the City of Chicago and a violation of this policy.

## **V. Duties of Members of the TTIC Community**

Each member of the TTIC community plays a significant role in ensuring that the TTIC is free from all forms of discrimination, harassment and abusive behavior, and that any incidents are promptly reported.

It is the responsibility of the faculty, staff, and students to discourage behavior that violates this policy and promote an environment of support. Any faculty member, staff employee, or student who witnesses discrimination, harassment, or abusive behavior or receives a report of such behavior is advised to refer the victim to the Title IX Coordinator or other appropriate party. (See Section VII, Filing a Complaint).

## **VI. Dealing with Discriminatory, Harassing or Abusive Behavior**

Any individual who perceives themselves to be the victim of discrimination, harassment, or abusive behavior in violation of this policy may consider taking one or more of the procedural steps described below, as applicable.

### **A. Discussion Between the Parties**

An initial course of action for any individual who feels that they have been a victim of discrimination, harassment or abusive behavior may be for that person to clearly assert to the perpetrator that the conduct is unwelcome, offensive, violates this policy, and must stop. This may solve the problem, and, if it does, further proceedings may not be necessary. This option is most appropriate when the alleged conduct is not of a severe or pervasive nature. **Communicating with the perpetrator is encouraged, but not a requirement before seeking other avenues of recourse under this policy.**

### **B. Confidential Support Counseling**

Persons who wish to have a confidential conversation regarding discrimination, harassment, or abusive behavior that does not constitute a formal complaint, and which will not result in an investigation, may contact one of the confidential resources listed below to discuss their concerns.

#### Students

University of Chicago Student Counseling Services <http://wellness.uchicago.edu>

24/7 Therapist On-Call: 773.702.3625      Appointments: 773.834.WELL

### Faculty and Staff

Employee Assistance Program provided by Principal <https://www.magellanascend.com/>  
800.450.1327

Because of the confidential nature of these resources, no personally identifiable information will be reported back to TTIC.

## **VII. Filing a Complaint**

An individual who believes that they have been subject to a violation of this policy, or a third party who believes they have knowledge of a violation, and wishes to file a complaint for resolution by TTIC should avail themselves of the procedures set forth below. This allows TTIC and the individual to work together in an effort to obtain a resolution to allegations of discrimination, harassment, or abusive behavior.

### **A. TTIC Complaint Procedures**

#### **1. How to File a TTIC Complaint**

If an individual believes that they have been the victim of discrimination, harassment or abusive behavior, or has knowledge of such behavior, and wishes to file a complaint, they may do so by:

- Notifying TTIC's Title IX Coordinator, or Deputy Title IX Coordinator; or
- Notifying an Officer of TTIC with whom the employee feels comfortable. This includes the President, Chief Financial Officer ("CFO"), Chief Academic Officer ("CAO"), or the Secretary of the Institute ("Secretary").
- Filing an anonymous report via TTIC's online Anonymous Complaint reporting system available at <http://www.ttic.edu/complaintform>

Contact Information for Filing Complaints:

|                             |                  |                    |          |
|-----------------------------|------------------|--------------------|----------|
| Title IX Coordinator        | Amy Minick       | aminick@ttic.edu   | 702-5033 |
| Deputy Title IX Coordinator | Chrissy Coleman  | ccoleman@ttic.edu  | 834-2216 |
| President                   | Matthew Turk     | mturk@ttic.edu     | 834-2493 |
| Chief Academic Officer      | Avrim Blum       | avrim@ttic.edu     | 834-1740 |
| Chief Financial Officer     | Jessica Jacobson | jjacobson@ttic.edu | 834-2571 |

An individual who believes that they have been the victim of discrimination, harassment or abusive behavior, or the person alleged to be the victim of such conduct in a complaint filed by a third party, will be identified in this policy document as the "Complainant" and the alleged offender will be identified as the "Respondent."

A complaint shall include the name(s), date(s), time(s), a detailed description of the allegations, and any other relevant information on which the complaint is based. A complaint may also be anonymous and share no self-identifying information in reporting the incident. Responses by TTIC to anonymous complaints may be limited due to lack of verifiable information.

Refer to Section IV (Retaliation) and Section VIII (Confidentiality) for information on how individuals filing complaints are protected under this Policy.

## 2. Filing Timelines

To help ensure that evidence is easily accessible and encourage expeditious and accurate resolution, TTIC encourages complainants to make a complaint as soon as possible after an occurrence of discrimination, harassment or abusive behavior. Complaints will be investigated regardless of when they are filed, but investigation and resolution options may be limited if the complaint is not brought forward in a timely manner. TTIC endeavors to complete its investigation within thirty (30) days from the date of notice of the complaint.

## 3. Investigation of Complaints

Investigations will normally be conducted by the Title IX Coordinator, Deputy Title IX Coordinator, or their designee. TTIC shall use its best efforts to conclude the Complaint Procedure within thirty (30) days from the date of reporting complaint in so far as is practicable.

If additional time is needed beyond thirty (30) days, the Investigator may extend the thirty (30) day time period for an additional thirty (30) days (the "extension period") and will so advise the Complainant and the Respondent.

The Investigator will conduct the investigations of all complaints using the process below:

- a) Inform the Complainant and Respondent of this policy and their rights and duties under it including the option of complaints of conflict of interest as addressed in Section VII.
- b) Formally apprise the Respondent of the charge of abusive behavior, including specific details of the incident and parties involved, in writing.
- c) Elicit from the Respondent an explanation of what occurred from his/her perspective.
- d) Arrange for interim relief for the Complainant, if deemed appropriate by the

Investigator.

- e) Provide both parties with the opportunity to provide information and identify witnesses.
- f) Investigate the allegations by conducting interviews or gathering other relevant information.
- g) Compile a report summarizing the investigation and its outcome, and submit to relevant parties as detailed in Resolution of Complaints below.

#### 4. Resolution of Complaints

Upon completion of the investigation, the Investigator will submit a written report of the investigation (including summary of facts, determination of policy violation using a preponderance of evidence standard (i.e. more likely than not) and severity, and recommendations on actions, including possible disciplinary action) to the appropriate supervisors:

- For claims in which the Respondent is a student, including University of Chicago students and Non-Degree Visiting Students, the report will be submitted to the Chief Academic Officer and the Director of Graduate Studies (or their designee[s]). In case of conflict of interest, the other person will designate a designee.
- For claims in which the Respondent is an academic appointee, the report will be submitted to the Chief Academic Officer and the President (or their designee[s]).
- For claims in which the Respondent is a staff member, visitor, or other member of the TTIC community, the report will be submitted to the Chief Financial Officer and the President (or their designee[s]).
- For claims in which the Respondent is an Officer of TTIC, the report will be submitted to the Board of Trustees. For claims in which the Respondent is a Trustee, the report will be submitted to a designee.

If the Supervisors conclude that a violation of this policy has occurred, they and the Investigator will discuss options for next steps with the Complainant. These options consist of informal or formal resolution. If the Supervisors conclude that a violation has not occurred, they will make an annotation to the report and notify both parties of their conclusion.

##### a) Informal Resolution through Mediation

If both parties to the complaint agree to participate, mediation is an option for an informal resolution to a complaint. Mediation will be conducted by the Investigator or his/her neutral designee. At any time, one or both parties may decide to leave the mediation process and enter into Formal Resolution.

##### b) Formal Resolution

If the Respondent and/or Complainant choose Formal Resolution, the Respondent's

supervisors will reach a consensus regarding the recommendations made by the Investigator regarding if, when and how those recommendations will be implemented. The supervisors in each instance are responsible for initiating any disciplinary procedures resulting from the investigation. All disciplinary procedures will be according to the handbooks, policies, bylaws and other governing documents for the Respondent's academic or employment status.

Regardless of the outcome of the investigation, the Title IX Coordinator will notify them of the investigation's findings and will issue a separate resolution letter detailing the results of the investigation to each party. TTIC strives to issue such a resolution letter within thirty to forty-five days of commencing an investigation.

## 5. Appeal of Investigation

A party who is not satisfied with the outcome of the initial investigation by the Investigator may request a secondary investigation by submitting a written appeal to the President or Secretary of the Institute within thirty (30) days of the issuance of the resolution letter by the Title IX Coordinator.

A party may only appeal an outcome on one or more of the following grounds:

- A procedural irregularity that would change the determination of whether a policy violation occurred.
- There is new evidence that would change the outcome of the matter and that was not reasonably available at the time the determination of whether the policy was violated occurred.
- The Investigator or Title IX Coordinator, as the case may be, had a conflict of interest or bias for or against complainants or respondents generally, or against the individual Complainant or Respondent that would change the outcome.
- The sanction is disproportionate with the violation.

No other grounds for appeal are permitted.

The President or the Secretary will review the appeal and arrange for a second investigation, if necessary (except in cases of conflict of interest – see Conflict of Interest in Section VII) led by a different Investigator from the initial Investigator.

The secondary investigation shall be completed within forty-five (45) days of receipt of the appeal and shall be conducted in accordance with the procedures set forth in Section VII above.

## **B. Additional Resources for Filing Discrimination Complaints**

In addition to internal TTIC reporting methods, employees have the right to file charges of discrimination with the government agencies listed below. All external charges of discrimination in which TTIC is identified as a Respondent, should be immediately directed to Human Resources.

Chicago Commission on Human Relations  
740 N. Sedgwick, 4th Floor  
Chicago, IL 60654  
312-744-4111  
[cchr@cityofchicago.org](mailto:cchr@cityofchicago.org)

U.S. Equal Employment Opportunity Commission (EEOC)  
Chicago District Office  
230 South Dearborn St., Suite 1866  
Chicago, Illinois 60604  
321-872-9744  
866-740-3953 (TTY)  
<https://publicportal.eeoc.gov/Portal/Login.aspx>

Illinois Department of Human Rights  
555 W. Monroe Street, Suite 700  
Chicago, IL 60601  
312-814-6200  
312-740-3953

## **C. Disciplinary Sanctions**

Disciplinary actions for violations of this policy may include one or more of the following:

- Any Sanctions as stipulated in the Student Handbook, Administrative Staff Handbook, or Faculty Handbook, as applicable;
- Requirement to attend training or other education;
- Requirement to obtain counseling;
- An oral or written warning (or letter of concern);
- A written reprimand;
- Suspension; and/or
- Dismissal/expulsion/termination/revocation of tenure.

The application of any disciplinary sanctions will be based on the individual incident and varied in method and severity based on the nature of the incident, and any history of problem behavior from the Respondent.

To the extent any employee is disciplined for violation of this policy, disciplinary sanctions and processes will be implemented consistent with any applicable TTIC policies, regulations, or other applicable rules.

#### **D. Malicious and False Accusations**

Allegations of discrimination, harassment, or abusive behavior that are determined by the Investigator to be both false and brought with malicious intent are considered a violation of this policy. A report and written recommendation on the matter will be sent to the appropriate parties for resolution of complaints as outlined in Section VII.A.4. The Complainant may be subject to the disciplinary sanctions set forth in Section VII.B.

#### **E. Conflict of Interest**

In all investigations of discrimination, harassment, or abusive behavior complaints, care will be taken to avoid real or perceived material conflicts of interest (Col). An example of a conflict of interest could be the identification of a personal or social relationship between a person serving in an investigation or resolution role under this Policy and one of the parties in the complaint. This relationship may have a real or perceived effect on the judgement of the person serving in the investigation or resolution role. An illustrative example of a conflict of interest might be the finding that the appeals officer of a harassment complaint wrote a letter of recommendation for the respondent describing the respondent as “honest to a fault.”

If conflict of interest is brought forth by the Investigator, Respondent, or Complainant, the President or the Title IX Coordinator may be contacted to appoint a neutral, independent third-party as an Investigator or Advisor to ensure the impartiality of the Investigation and Resolution. If a conflict of interest involves either the President or the Title IX Coordinator, the other person will be responsible for appointing a neutral Investigator or Advisor.

#### **F. Documentation**

Documentation concerning allegations and investigations of illegal discrimination, illegal harassment, or abusive behavior may consist of: testimonial evidence provided during an investigation or a hearing; documentary evidence submitted during an investigation or a hearing; an after-the-fact statement recounting a process or its results; and/or an explanation prepared for the record as to why the Investigator or member of the TTIC community took a particular step or reached a particular decision with regard to a complaint of discrimination, harassment, or abusive behavior. Documentation can be handwritten, voice transcribed, typewritten, or in any printed or electronic form.

The amount of documentation which is reasonable and prudent with regard to any of the processes outlined in this policy is left to the judgment of the Investigator.

The Investigator's report, Complainant and Respondent resolution letters and any other documentation prepared by the Investigator for TTIC's use will be maintained in a separate "Complaints" file and the personnel or student file of the Complainant and Respondent for at least seven (7) years in accordance with TTIC's record retention policy and applicable law.

All documentation required to be maintained by Title IX Coordinator shall be available only to any person authorized to view employee or student files, any person conducting an investigation under this Section VII, TTIC's legal counsel, or other duly authorized state or Federal agency.

### **VIII. Confidentiality**

It is to be expected that, at all stages of any proceedings under this policy, confidentiality will be maintained to the greatest extent possible. Consistent with their obligations, all roles described herein are expected to maintain the highest standards of confidentiality.

TTIC takes very seriously the privacy of its employees, students, and visitors. As such, it will endeavor to keep all investigations and resolutions as confidential as possible. As discussed in Section VII, Filing a Complaint, the identities of the Complainant and Respondent will be disclosed to each party at the beginning of the investigation. In addition, it may be necessary to disclose information pertaining to the investigation to the Complainant, Respondent and/or witnesses in order to conduct a full and thorough investigation. All involved parties will be encouraged to keep confidential to the greatest extent possible matters about which they or others provide testimony or information.