

## ***A. TITLE IX POLICY***

Urshan is committed to excellence in education that is based on Christian values and standards. UGST believes this goal can only be achieved in an environment free of discriminatory behavior, sexual harassment, or retaliation. Discriminatory behavior, sexual harassment, and retaliation undermine the mission of UGST. The intent of Urshan is to provide an environment for students, employees, and faculty that is free from these practices.

Discrimination, harassment, and retaliation of any form are a violation of a person's rights, dignity, and integrity. Such acts debase the integrity of the educational process and are contrary to the mission and values of Urshan. In response to any reported misconduct, administration will take appropriate steps to eliminate the misconduct, prevent its recurrence, and address its effects. Urshan will review and investigate all reports, and provide for fair and impartial evaluation and resolution. Retaliation is prohibited against a person who makes a report of discrimination or harassment.

Several Federal, State and local laws prohibit discrimination and harassment in employment on the basis of legally protected characteristics. In addition, Title IX of the Federal Civil Rights Act, and the Federal Clery Act, prohibit discrimination, including harassment and violence, on the basis of gender and sex in federally funded educational programs and activities.

### ***Non-Discrimination Clause***

In employment, in access to educational opportunities, and in all other areas of life, Urshan prohibits unlawful discrimination and harassment on the basis of race, ethnicity, color, national origin, age, religion, disability, gender, marital status, and other characteristics protected by federal, state or local statute or ordinance. Because Urshan is a Christian institution, the institution may, under the Free Exercise Clause of the First Amendment to the Constitution of the United States and various relevant statutes, lawfully discriminate on the basis of religious and confessional criteria in its employment and educational practices. One example is Urshan's use of Apostolic doctrine and faithful church attendance as conditions of employment for faculty and administrators with faculty status. Another example relates to sexual conduct. Although it is the institution's policy to assure equal opportunity in its hiring, personnel practices and admissions without regard to marital status, sexual relations outside of marriage are prohibited. Marriage, as understood by the UPCI is a sacred union between a man and a woman.

### ***Definition of Discrimination***

Discrimination is defined as unequal, adverse treatment of an individual because of his or her protected legal status, such as race, age, or gender. For instance, different treatment of two similar individuals with respect to pay, opportunity for advancement, or educational opportunity constitutes discrimination if the reason for the different treatment is the protected status of one of the individuals.

### ***Definition of Harassment***

Harassment is defined as unwelcome verbal or physical conduct that is sufficiently severe, persistent or pervasive such that it unreasonably interferes with, denies, or limits someone's employment access, benefits or opportunities, and/or the ability to participate in or benefit from Urshan's educational program and/or activities, or constitutes retaliation.

Examples of harassment based on actual or perceived membership of a protected characteristic, whether race, ethnicity, gender, age, or any other protected characteristic include, but are not limited to: epithets, slurs, denigrating jokes or negative stereotyping; threatening or causing physical harm, extreme verbal abuse, or other conduct which threatens or endangers health or safety; written or graphic material that degrades or shows hostility or aversion; pranks or horseplay intended to embarrass or humiliate; imposing submission to unwelcome verbal or physical conduct; stalking, bullying, hazing; any other action that is motivated by the actual or perceived membership of the victim in a protected class.

### ***Definition of Retaliation***

Retaliation, also called retaliatory harassment, is any adverse employment or educational action taken against a person because of the person's participation in a complaint or investigation of discrimination or harassment of any kind. Retaliation against an individual for alleging harassment, for supporting a complainant or for assisting in providing information relevant to a claim of harassment is a serious violation of Urshan policy. Individuals who engage in such actions are subject to discipline up to and including suspension or dismissal from school, consistent with the institution's procedures. Acts of alleged retaliation should be reported immediately to the Title IX Coordinator. Urshan is prepared to take appropriate steps to protect individuals who fear they may be subjected to retaliation.

### ***Reporting is Vital***

Violations of the Title IX Policy, including gender and sex-based harassment and discrimination, must be reported under Federal law. Whoever receives such reports or observes such behavior is required to report all violations. Urshan's commitment to an environment free from discrimination and harassment calls on every member of the community to be vigilant in deterring and reporting all violations.

Reporting may pose concerns about confidentiality, the effect on the reporter or on other persons. Or a reporter may wonder whether the observed offense is serious enough to report. To assist and support the reporter, the following resources are available: office of the Dean of Students, the EVP's office, off-campus local and state agencies, and counselors recommended by the Dean of Students.

Confidentiality and privacy for the reporter are valued. In working with reporters, the institution will be guided by the goals of empowering the victim and allowing the victim to retain as much control over the process as the case allows, but no Urshan employee (other than the campus pastor, under certain circumstances) can or may promise confidentiality over the entire course of the process. When the investigation and/or

resolution process requires disclosure of certain information, Urshan will keep the reporter informed, and protected to the extent permitted by the circumstances.

### ***Investigation***

The investigation will be conducted with no pre-disposition position towards any particular finding or result. The investigation will be a fair, objective, impartial and thorough inquiry into the allegations of the complaint, the responses and defenses raised by the respondent, and other relevant issues. Complainants and respondents, as well as other witnesses, will be respected and their suggestions and input concerning the scope and focus of the investigation will be given due regard. When appropriate or needed, the Title IX Coordinator may utilize outside assistance in conducting an investigation. The Title IX Coordinator will notify the appropriate administrators (Academic Deans, EVP) when an investigation begins and update them as needed throughout the process.

### ***False Complaints***

Urshan will seriously investigate all complaints. However, it also recognizes that false complaints are likely to cause significant damage to the person and reputation of an individual who is wrongfully accused. Individuals found to have knowingly made false complaints will be subject to disciplinary action. A complaint that is erroneous but made in good faith will not be subject to disciplinary action.

*Additional information about this policy is available upon request from the office of the Dean of Students.*