

Policy on Discrimination, Harassment and Bias Incidents

Approval Authority: Cabinet
Responsible Officer: Vice President for Human Resources; Vice President for Student Affairs
Responsible Office: Division of Human Resources; Division of Student Affairs
Effective Date: June 2, 2025

I. Purpose of this Policy

The Trustees of the Stevens Institute of Technology (“Stevens” or the “University”) is committed to equality of opportunity and creating a campus climate that supports, nurtures, and rewards educational and career advancement on the basis of ability and performance. Stevens recognizes the dignity of each member of its community and believes that each member has a responsibility to promote respect and dignity for others so that all members of the community are free to pursue their goals in an environment free from discrimination, harassment, and bias.

Stevens is committed to compliance with all federal, state, and local civil rights laws, statutes and regulations banning discrimination, harassment, and bias incidents in private institutions of higher education as applicable to Stevens.¹

All members of the community are encouraged to report any violations promptly. It is a collective responsibility to ensure that all concerns are assessed and addressed appropriately.

II. Policy

A. Scope of Policy

This Policy sets forth expectations for all members of the Stevens community and for non-community members visiting the Stevens campus or participating in University programs. It applies to conduct that occurs on Stevens’ campus and to all programs and activities sponsored by Stevens, even if such a program or activity takes place off-campus.

In certain instances, [Stevens’ Title IX Policy²](#) and [Stevens’ Policy on Accessibility and Accommodations for Individuals with Disabilities³](#) operate to supplement and/or supersede this Policy.

This Policy is distributed to the Stevens community by the Division of Human Resources, and additionally to students by the Division of Students Affairs within the Student Handbook, on an annual basis.

¹ These laws, statutes and regulations include, but are not limited to, Title VI of the Civil Rights Act of 1964, Section 504 of the Rehabilitation Act of 1973, Title IX of the Education Amendments Act of 1972, the Age Discrimination Act of 1975 and 6 C.F.R. Part 19.

² https://assets.stevens.edu/mviowpldu823/4h92XwQdAfC0ZsNpTrEViV/717c2b1b1ffd864c602ce89da30b44e8/Stevens_Title_IX_Policy_Final_8.14.20.pdf

³ https://assets.stevens.edu/mviowpldu823/1wSSuEHppj2t4ztppkqHj1/a52d84f132e2c4b7676bc9d1b5d8ee7d/Accessibility_Accommodation_for_Disabled_Individuals_70p7_9-20-17.pdf

B. Prohibited Conduct

1. Discrimination

Stevens provides equal employment opportunity and makes the benefits and services of its educational and research programs available to employees and students without discrimination on the basis of any individual's race, color, sex, pregnancy or pregnancy-related condition, religion, creed, national origin (including shared ancestry, ethnic characteristics, or citizenship or residency in a country with a dominant religion or distinct religious identity), citizenship status, physical or mental disability, age, marital status, sexual orientation, gender identity or expression, veteran or military status (including special disabled veteran, Vietnam-era veteran or recently separated veteran), predisposing genetic characteristics, domestic violence victim status, or any other characteristic protected by applicable law (each, a "Protected Characteristic").

2. Harassment

Harassment is unwelcome, offensive conduct that occurs on the basis of a Protected Characteristic. It is a form of discrimination and violates this Policy. Conduct that violates this Policy is not necessarily a violation of the law.

While it is not possible to identify every form of conduct that can constitute harassment, harassing conduct can occur in various forms, including:

- **Verbal Harassment**, including unwelcome sexually suggestive, demeaning or graphic comments; using ethnic, racial, religious or other slurs to refer to a person; jokes or comments that demean a person, in each case on the basis of a Protected Characteristic;
- **Physical Harassment**, including unwanted sexual contact; sexual intimidation through physical threats; unwelcome touching, patting or grabbing; or physical threats toward or intimidation of another person, in each case on the basis of a Protected Characteristic;
- **Visual Harassment**, including exposing another person to unwanted pornographic images; creating or displaying racially, ethnically or religiously offensive pictures, symbols, cartoons or graffiti, in each case on the basis of a Protected Characteristic; and
- **Communication-Based Harassment**, including phone calls, emails, text messages, chats or blogs that offend, demean or intimidate another person, in each case on the basis of a Protected Characteristic.

A hostile environment is created when the offensive behavior is based on a Protected Characteristic and, from the viewpoint of a reasonable person under all relevant circumstances, is so severe, pervasive and objectively offensive that it interferes with a person's ability to participate in a University program or activity.

A determination as to whether harassment occurred depends on the totality of the circumstances,

including the context of a communication or incident, the relationship of the individuals involved in the communication or incident, whether an incident was an isolated incident or part of a broader pattern or course of offensive conduct, the seriousness or severity of the incident, the intent of the individual who engaged in the allegedly offensive conduct, and its effect or impact on the individual and the learning community. Harassment may include, but is not limited to, the following acts that denigrate or show hostility or aversion based on a Protected Characteristic: verbal abuse; epithets or slurs; negative stereotyping (including, but not limited to, stereotypes about how an individual looks, including skin color, physical features, or style of dress that reflects ethnic traditions; a foreign accent; a foreign name, including names commonly associated with a particular shared ancestry or ethnic characteristics; or speaking a foreign language); threatening, intimidating, or hostile acts; denigrating jokes; insulting or obscene comments or gestures; calls for violence; and the display or circulation of written or graphic material in any form, including but not limited to social media.

The fact that a person was personally offended by a statement or incident does not alone constitute a violation of this Policy. Importantly, if the conduct or incident in question did not occur because of one or more Protected Characteristics, such conduct is not regulated by this Policy.

3. Bias Incidents or Hate Crimes

A bias incident constitutes violence to a person or damage to property (or a threat to do so) or an act of intimidation that is motivated entirely or partly by hostility toward or intolerance of another person's Protected Characteristic. Individuals who cause bias incidents act in violation of this Policy.

A bias incident may be a hate crime. Federal and state laws prohibit hate crimes, and hate crimes often result in enhanced criminal penalties. Individuals who commit hate crimes may be subject to criminal prosecution in addition to discipline pursuant to this Policy. The fact that a criminal complaint has been filed, prosecuted or dismissed will not prevent Stevens from pursuing disciplinary action.

Bias incidents and hate crimes are forms of discrimination and constitute violations of this Policy.

C. Reporting and Investigating Discrimination, Harassment and Bias Incidents

1. Reporting an Incident

Any member of the University community who (a) has been subject to discrimination, harassment or a bias incident, (b) has witnessed clear circumstances of discrimination, harassment or bias or (c) has experienced or believes another person has experienced a hostile environment, should report it.

- Students should report such conduct or incidents to the Office of the Vice President for Student Affairs or via the "Report a Concern" link on my Stevens.
- Employees should report such conduct or incidents to their supervisor or the Vice President for Human Resources.
- Visitors should report such conduct or incidents to a University administrator or a Campus Police officer, who will refer the report to the

appropriate office.

Though anonymous complaints can be more difficult for the University to investigate, members of the University community may also report concerns anonymously through the University's EthicsPoint Compliance Hotline at (855) 277-4065, or on the [EthicsPoint website](https://secure.ethicspoint.com/domain/media/en/gui/31028/index.html).⁴ Individuals with limited English proficiency should contact the International Student and Scholar Services office or the Division of Human Resources for assistance with reporting an incident under this Policy.

2. Investigation

- A. The University will investigate conduct that violates this Policy and take remedial action where appropriate. Depending on the circumstances, the Assistant Vice President, Human Resources (or designee), the Assistant Vice President for Student Affairs (or designee) or another appropriate administrator will lead the investigation (the "Investigator"). Specifically:
- If the incident involves a student, the Investigator will be the Assistant Vice President for Student Affairs (or designee);
 - If the incident involves only employees, the Investigator will be the Assistant Vice President, Human Resources (or designee); and
 - If the incident involves third parties and does not involve a student, the Assistant Vice President for Student Affairs and the Vice President, Human Resources, in consultation with the Office of the General Counsel, will determine the identity of the Investigator.
- B. The Investigator will acknowledge and seek to complete an initial assessment of the complaint as promptly as possible, typically within ten (10) days of the complaint. The Investigator will seek to complete the investigation within sixty (60) days of the complaint. There may be circumstances in which the investigation takes longer for reasons which may include the availability of the complainant (if any), the availability of or need to gather additional necessary information, or other factors. The Investigator will endeavor to keep both the complainant and respondent (in each case, if any) informed of the timing of the investigation and its expected conclusion.

3. Interim Measures

In certain situations, interim changes in class assignments, residence hall assignments, transportation arrangements or work assignments, or other reasonable accommodations, may be effected pending the completion of an investigation, as appropriate. The University will review the facts and circumstances of each case in deciding whether interim measures are appropriate and, if so, will put appropriate interim measures in place. The University will inform both the complainant and respondent (in each case, if any) of any such interim measures taken pending the completion of the investigation.

⁴ <https://secure.ethicspoint.com/domain/media/en/gui/31028/index.html>

4. Findings and Recommendations

Following the investigation, the Investigator will communicate a summary of their factual conclusions to the complainant and respondent (in each case, if any).

Where the Investigator concludes that a violation of this Policy has occurred, the University, via appropriate administrators, will take prompt and appropriate remedial action, which may include disciplinary action, up to and including dismissal from University employment or expulsion.

5. Appeal

If the complainant or respondent (in each case, if any) is dissatisfied with the decision of the Investigator, the decision may be appealed to the Vice President for Student Affairs or the Vice President for Human Resources (as appropriate), whose decision shall be final.

6. Mitigation and Accommodations

Stevens is committed to creating a supportive environment in which individuals feel safe. Depending on the situation, support services and reasonable accommodations for students may include counseling, room or class changes, and/or ongoing support. For employees, support measures and reasonable accommodations may involve referrals to the Employee Assistance Program, referrals to mental health resources, changes in the work environment, training and preventative measures.

Issues and complaints will also be referred, as appropriate, to other administrative offices or bodies with overarching responsibility for assessing allegations or incidents arising under this Policy, and/or the climate on campus, and are in existence from time to time (e.g., the Initial Assessment Team which is a standing committee responsible for conducting initial assessments of all reports, incidents, protests, posters, and other matters under Title VI).

D. Statement Against Retaliation

Retaliation is a violation of University policy. The University recognizes that retaliation can take many forms, may be committed by or against an individual or a group, and that a respondent or third party may also be the subject of retaliation. Retaliation against anyone involved in making a good faith report regarding a potential violation of this Policy, participating in the report or investigation process, or otherwise providing information regarding allegations of misconduct is prohibited by this Policy and will not be tolerated. Any retaliation occurring at any time during or after the investigation should be reported and will be investigated by the University under the same processes and standards outlined in this Policy. Anyone found to have engaged in retaliation shall be subject to discipline, including potential dismissal from University employment or expulsion.