

INTERIM BIAS INCIDENT RESPONSE PROTOCOL POLICY

RESPONSIBLE DEPARTMENT

Office of the President

EFFECTIVE DATE: March 14, 2016

PURPOSE

The St. Louis College of Pharmacy is committed to providing a diverse and inclusive learning and working environment free from discrimination and hate. This policy establishes a Bias Incident Response committee and procedures to receive reports of bias incidents and hate crimes, ensure that affected individuals receive adequate resources and support, and facilitate a coordinated campus response including restorative practices and socially just measures to promote healing and prevent such incidents from occurring.

APPLIES TO

This policy applies all faculty, staff, students, visitors, and contracted employees of the St. Louis College of Pharmacy.

DEFINITIONS

Bias Incident: any behavior or act directed against an individual or group based on their real or perceived consideration of sex, gender, race, color, religion, national origin, ancestry, disability, age, sexual orientation, marital status, pregnancy or other protected classification. While controversial ideas or opinions are a hallmark of higher education, the expression of bias or hate against individuals or groups is a form of discrimination and harassment that violates the College's policies and applicable federal laws prohibiting discrimination and harassment.

Bias Incident Response committee: A committee established by the President to develop a restorative and socially just response to incidents of bias incidents and hate crimes.

Hate Crime: A bias motivated crime that is subject to increased penalties under Missouri and federal laws and mandatory reporting requirements under the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act ("Clery Act"). A hate crime is a bias incident but not all bias incidents are hate crimes.

Restorative Justice: The philosophy that empowers individual victims, offenders, and communities to actively engage in a process to identify hurt or harm caused by the offenders, and requires offenders to take responsibility for their actions and repairing the hurt or harm caused to victims. Restorative justice includes interventions or measures such as victim-offender dialogue, community conferencing, restorative circles, reparation, apology, community service, public declaration, and continued engagement in educational opportunities.

POLICY

St. Louis College of Pharmacy (“College” or “STLCOP”) strives to create an inclusive culture of peoples with unique backgrounds and perspectives that supports our mission of educating world-class pharmacists and health care professionals who are culturally competent to work effectively in community or multi-disciplinary settings and serve patients who identify with different social groups. Intolerance, bias, and hate directed at individuals or groups because of race, color, religious belief, sex, pregnancy, marital status, sexual orientation, gender identity or expression, national origin, ethnicity, disability status, age or other protected classification is detrimental to the College’s mission and fundamental values of diversity and inclusion and will not be tolerated. This policy establishes a Bias Incident Response committee (“BIR”) to serve as a central resource for reporting bias incidents and hate crimes, to provide guidance to administrators on investigations and enforcement of the College’s discrimination and harassment policies, and develop informed strategies including restorative justice practices to promote inclusion, support, and repair of hurt or harm caused to affected individuals and the College Community.

PROCEDURES

Reporting a Bias Incident or Hate Crime

Any person who is a victim or learns of a bias incident or hate crime is strongly encouraged to report it directly to the following College administrators and the BIR:

1. Emergencies

In cases involving potential or imminent physical harm or violence on campus, report the incident immediately to STLCOP Security Services by calling 314-446-SAFE (7233 and/or the St. Louis Metropolitan Police Department at 314-444-5385. STLCOP security officers will deploy as first-responders to the scene and/or coordinate notification to the St. Louis Metropolitan Police Department and other emergency services. The Director, Campus Security will ensure that timely warning notices are sent to the Community whenever there is an immediate or continuing threat of harm.

2. Faculty/Staff

Daniel Bauer, PHR
Title IX and Section 504 Coordinator
Director, Human Resources
314-446-8308
Jones Hall, Room 1340
Daniel.bauer@stlcop.edu

3. Students

Rebecca Jones
Deputy Section 504 & Title IX Coordinator for Students
Director, Academic Support Services

314-446-8352
Student Success Center, Room 2124
314-446-8352
Rebecca.Jones@stlcop.edu

4. Bias Incident Response committee

TBD

The BIR reporting mechanism for any violation should be completed by following this link to the Bias Incident Report Form <https://stlcop-advocate.symplicity.com/public/>. Once the completed report has been submitted, a designated BIR representative will use a secure and confidential method to route the report to the BIR.

Bias Incident Response

The BIR will include a diverse group of individuals from the College community to coordinate the handling and response to any report of a bias related incident or hate crime. The BIR will be comprised of six core members including one member appointed by the President, one member appointed by the Dean, School of Pharmacy, one member appointed by the Dean, School of Arts & Sciences, one member appointed by the Faculty Senate, one member appointed by the Staff Council, and one member appointed by the Student Government Association. BIR members will have experience, education, or receive training in the areas of cultural competency, discrimination, intolerance, and privilege, and restorative measures to prevent and address bias incidents and hate crimes when they occur. The Vice President Culture & Campus Life and the General Counsel will serve as resources to the BIR. Outside consultants and experts will be retained to train the BIR or provide services needed to effect this policy.

Coordination

This policy is not intended to replace existing reporting structures and procedures that currently exist under other College policies prohibiting discrimination or harassment. However, the purpose of the BIR is to serve as a support group with expertise to serve as a first-responder and develop strategies to address issues that have broader implications for groups or Campus climate. College administrators and employees responsible for receiving reports of bias incidents and hate crimes have an affirmative obligation to promptly report the incidents to the BIR Chair. Upon receipt of a report, the BIR will be convened to determine if the information indicates that a bias incident or hate crime may have occurred. The BIR will do an assessment and make recommendations to administrators for victims and affected individuals to receive adequate support services and access to resources. Additionally, the BIR will assist College administrators to develop an investigation plan, ensure that applicable policies for adjudication are followed, and develop an appropriate response for addressing the harm to individuals and the Community. The BIR Chair will notify the President and executive leadership of any bias incident or hate crime no later than twenty-four (24) hours after receipt of a report.

Adjudication/Restorative Justice

The College believes that restorative justice is consistent with its mission of providing a safe and inclusive environment and educating culturally competent health care professionals and pharmacists through the transformative power of learning. Restorative justice provides victims and offenders with opportunities to create a pathway for social justice and personal change that may be preferred to the traditional process or sanctions. It is particularly suited for cases involving students and has been extensively used in the criminal justice system to empower victims and promote personal accountability of offenders. Restorative justice is not leniency and may include taking appropriate interim measures or imposing traditional sanctions to protect victims or the Community, to facilitate the process, or whenever offenders do not comply with an agreed upon process or remediation plan.

The BIR will monitor the adjudication of bias incidents and hate crimes to ensure that appropriate policies and procedures governing faculty, staff, or students are followed in a prompt and timely manner. It will recommend restorative interventions and measures to personnel and College boards or committees responsible for adjudicating such cases to promote individual and community healing and learning.

Privacy

The College recognizes the importance of individual privacy and will seek to honor requests for confidentiality by the reporting party. Individuals may also file anonymous reports. However, the College may be limited in such instances in its ability to respond or take appropriate action. Administrators will inform a party requesting confidentiality that the College may be limited in its ability to respond and that it must weigh the request against the potential harm of non-disclosure. In some cases, the BIR may recommend as an interim or remedial measure that a notice be sent to the College Community. The BIR will consider the totality of the circumstances and consult with the parties and interested stakeholders as needed.

Communications regarding the accused will be handled by College administrators on a need to know basis, as required by law, and to the extent necessary for the College to respond properly.

Tracking and Reporting

The BIR will take appropriate steps to ensure that all reports of bias incidents and hate crimes are properly recorded in a BIR Log and the Campus Crime Log. It will submit an annual report summarizing the BIR Log to the President for distribution to the College Community. The Director, Security Services will review the BIR Log and annual BIR report to ensure that hate crimes are properly recorded in the Campus Crime Log and the Annual Clery Report. Timely notices regarding specific incidents will be provided to the College Community as needed. All notices, reports, and logs will be published and made available to the College Community consistent with the Clery Act, FERPA, and applicable privacy laws. Except in the case of a current or on-going threat requiring a Clery notice, the intent is to achieve transparency without causing further harm to individuals by de-identifying personal identifying information.

Training

The BIR will review incidents and make recommendations on education and training initiatives to the Vice President of Culture & Campus Life and Director, Human Resources. These initiatives will include

discrimination and harassment training, cultural competencies, social group identities, bystander intervention, and how to create safe places.

Related College Policies

This Bias Incident Response protocol is intended to supplement the procedures and important information set forth in the following College policies prohibiting discrimination and harassment:

Harassment, Sexual Misconduct, Relationship Violence, and Stalking

Care Team Policy

Information Technology Acceptable Use Policy

Student Code, Social Media Policy

Student Code, General Standards of Conduct

Student Code, Professional Misconduct