**SPST Policy: CCP 14**

**Anti-Harassment, Anti-Discrimination, Anti-Retaliation**

Adopted: 6/30/2015

Updated: 10/12/2016

Saint Paul School of Theology is committed to education and prevention of sex crimes and sexual harassment at all seminary sites. The purpose of this policy is to uphold Saint Paul School of Theology’s commitment to preserving the fundamental dignity and rights of all individuals involved in Seminary activities. Harassment based on race, color, creed, religion, sex, pregnancy status, sexual orientation, genetic information, marital status, national origin or ancestry, age, gender, disability, citizenship or intending citizenship status, gender identity, veteran status, or any other status protected by law (“protected status”) will not be tolerated. Prohibited discrimination, harassment and retaliation are contrary to the education and employment values of Saint Paul School of Theology.

All members of the Saint Paul community have the right to a be free from harassment, discrimination, and retaliation from anyone – students, faculty, staff, supervisors, co-workers or others, including clergy, congregation members, vendors, suppliers, and contractors with whom the employee or student has contact as a result of the individual’s’ employment, study, or contextual education ministry setting while at Saint Paul, whether on the property or off property at a Saint Paul related event.

Preventing prohibited discrimination, harassment and retaliation is the responsibility of all members of the Saint Paul community. Possible violations of this policy (a “Concern”) should be reported as soon as possible to the Equity Compliance Officer or other designated personnel. Every effort will be made to respond to concerns of perceived prohibited conduct in a reasonable, thorough, and timely manner. If anyone feels that the Seminary has not met its obligations under this policy, that person should contact the Equity Compliance Officer.

a) Discrimination

It is a violation of this policy to discriminate on the basis of race, creed, color, religion, national origin, sex, gender, age, disability, pregnancy status, sexual orientation, veteran status or any other status protected by law, in any employment programs, experiences, activities, and opportunities.

b) Sexual Harassment

Sexual harassment of any form or nature constitutes discrimination under the law and will not be tolerated. As part of the above-stated policy, no student, faculty, staff or any person may sexually harass another individual. Prohibited sexual harassment includes unwelcome sexual advances, requests for sexual favors, and other verbal or physical or other non-verbal conduct of a sexual nature when (1) submission to or rejection of such conduct is made either explicitly or implicitly a term or condition of employment; (2) submission to or rejection of such conduct by an individual is used as a basis for employment decision affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating or hostile working environment. Sexual violence is a prohibited form of sexual harassment.

Sexual violence includes physical sexual acts perpetrated against a person’s will or where a person is incapable of giving consent due to use of drugs and/or alcohol or to an intellectual or other disability. Some examples of sexual violence may include rape, sexual assault, sexual battery, and sexual coercion. Other examples include, but are not limited to:

* Unwelcome or offensive sexual innuendo
* Subtle pressure for sexual activity or coercion to date
* Sexist remarks or jokes about a person's body, physical appearance or private life
* Degrading remarks, posters, pictures, photographs, cartoons, drawings, graffiti or other objects in the workplace that contribute to an intimidating work environment
* Touching, making improper or unwelcome advances or propositions
* Abusive, crude or vulgar language with sexual implications

c) Harassment Based on Other Protected Characteristics

Harassment based on other protected characteristics is also strictly prohibited. Saint Paul School of Theology prohibits unwelcome verbal or physical conduct that denigrates or shows hostility or aversion toward an employee or person because of race, color, religion, age, national origin, disability, pregnancy status or any other protected status protected by law and that 1) has the purpose or effect of creating an intimidating, hostile or offensive work environment; 2) has the purpose or effect of unreasonably interfering with an individual's work performance; or 3) otherwise adversely affects an individual's employment opportunities. This prohibition applies to all individuals who work for or with the Seminary, or other persons conducting business with Saint Paul.

Examples of conduct prohibited by this policy include, but are not limited to

* Visual forms of harassment, such as markings, cartoons, graffiti and drawings;
* Verbal harassment, such as racial remarks, jokes, epithets, slurs or negative stereotyping;
* Threatening, intimidating or hostile acts;
* Written or graphic materials that denigrates or shows hostility or aversion toward an individual or group;
* Denigrating remarks and jokes or pranks related to a protected class;
* Actions against or actions that tend to exclude persons due to their association with a protected class.

Saint Paul School of Theology has zero tolerance for any prohibited behaviors or conduct and violators will be disciplined, up to and including termination.

d) Reporting

Any employee who has a question, concern, or complaint of discrimination, including harassment based on his/her protected status, or retaliation is encouraged to bring the matter to the immediate attention of the Equity Compliance Officer. Any Saint Paul School of Theology official who becomes aware of any complaint of harassment should contact the Equity Compliance Officer. Any individual who believes that he or she has been the subject of conduct or has witnessed conduct prohibited by this policy, whether it is conduct of students, faculty, staff, supervisors, co-workers or others, including clergy, congregation members, vendors, suppliers, and contractors with whom the employee or student has contact as a result of the individual’s’ employment, study, or contextual education ministry setting while at Saint Paul, or anyone else associated with the organization, should report the incident(s) immediately to the Equity Compliance Officer or the Director of Human Resources. Individuals are urged to use this procedure to report any incidents so that a prompt investigation can be conducted. Every effort will be made to respond to Concerns of perceived prohibited conduct in a reasonable, thorough and timely manner. If any one feels that the Seminary has not met its obligations under this policy, that person should contact the Equity Compliance Officer.

e) Investigation

Saint Paul School of Theology has a compelling interest in protecting the integrity of the investigation and endeavors to protect witnesses from harassment, intimidation and retaliation, to keep evidence from being destroyed, to ensure that testimony is not fabricated, and to prevent a cover-up. In some instances, Saint Paul School of Theology may decide that to achieve these objectives, those involved must maintain the investigation and any person’s role in said investigation as confidential to the extent necessary to protect the investigation. Employees are expected to cooperate fully in any investigation. False and bad faith complaints of harassment, discrimination or retaliation will be subject to disciplinary action. More information on formal investigation process can be found on the shared computer drive.

f) Retaliation

Saint Paul School of Theology prohibits retaliation against anyone for reporting discrimination/harassment, assisting in making a complaint, or cooperating in an investigation as a witness or in a related role. Retaliation prohibited by this policy includes, but is not necessarily limited to, disparaging comments, uncivil behavior, or other negative treatment of an employee because a complaint was made pursuant to this policy or otherwise cooperated with Saint Paul’s investigation. Anyone who believes he/she has experienced or witnessed retaliation should immediately notify the Equity Compliance Officer.