



**AMERICAN
UNIVERSITY
OF BEIRUT**

NONDISCRIMINATION POLICY FOR STUDENTS ENGAGED IN AUB EDUCATION PROGRAMS OR ACTIVITIES IN THE UNITED STATES

Version Number: 1
Document Category: Policy
Document Owner: Debs Center in New York City
Last Review Date: August 1, 2024

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I. POLICY STATEMENT

American University of Beirut (“AUB”) encourages a diverse student body and is committed to the principle of equal opportunity in education. Consistent with this commitment and with federal, state and local laws, it is the policy of AUB not to tolerate any kind of discrimination and to provide those who feel they are victims of discrimination with mechanisms for seeking redress, as described further below.

AUB works towards increasing awareness of discrimination, diligently investigating all reports of discrimination and discriminatory harassment, and dealing fairly and firmly with offenders. Creating a safe campus environment and a culture of respect is the shared responsibility of all members of the AUB community, individually and collectively.

Inquiries regarding discrimination and discriminatory harassment may be directed to the Title IX Coordinator, or by email at titleix@aub.edu.lb.

The Office of the President maintains a resource page on Non-Discrimination initiatives and Title IX at www.aub.edu.lb/titleix.

II. PURPOSE

The aim of this policy is to promote a safe, respectful, and ethical academic environment in which student members of the AUB community are free from any kind of discrimination or discriminatory harassment in connection with their engagement in AUB education programs or activities in the United States.

III. SCOPE

This policy applies to allegations of discrimination involving students engaged in an AUB education program or activity in the United States.

Non-student members of the AUB community, including faculty and staff, are subject to this policy if the alleged victim or alleged perpetrator of the discrimination or discriminatory harassment is an AUB student engaged in AUB education programs or activities in the United States.

IV. WHO SHOULD READ THIS POLICY?

All members of the AUB Community who may be involved in AUB education programs and activities in the U.S., including without limitation, the Debs Center.

V. DISCRIMINATION

AUB prohibits discrimination—including discriminatory harassment—against students (individually, a “covered person”) because of the individual’s race or color, religion or creed, alienage or citizenship status, sex (including pregnancy and pregnancy-related conditions), national origin, age, sexual orientation, gender identity or expression, sexual and reproductive health decisions or decision making (of covered persons or their

dependents), disability, height, weight, marital status, familial status, domestic partnership status, caregiver status, genetic information or predisposing genetic characteristics, military status, domestic violence, sexual violence, or stalking victim status, or any other characteristic protected by law (individually, a “Protected Characteristic”, and collectively, “Protected Characteristics.”).

AUB allows all individuals to use single-sex bathroom facilities consistent with their gender identity or expression. AUB will not require a student to sign a waiver which purports to deny a student right to make their own sexual and reproductive health decisions or decision making, including the use of a particular drug, device, or medical service or take any other adverse personnel action based on the sexual and reproductive health decisions or decision making of the student or their dependent(s). In addition, AUB will not access a student’s personal information regarding the student’s or any student-dependent’s sexual and reproductive health decisions and decision making, including, but not limited to, the decision to use or access a particular drug, device, or medical service, without prior written consent.

This prohibition against discrimination and discriminatory harassment applies to all conduct involving students participating in an AUB education program or activity in the United States, including, but not limited to, AUB’s administration of its educational and admissions policies, and other university programs and activities.

VI. DISCRIMINATORY HARASSMENT

As part of this Policy, AUB prohibits conduct that constitutes or could lead or contribute to harassment because of an individual’s Protected Characteristic(s). When taken against an individual because of that individual’s Protected Characteristic(s), examples of such conduct include, but are not limited to:

- ethnic slurs;
- use of AUB’s computers (including via the Internet) or AUB’s e-mail system to view or distribute racially offensive communications;
- bullying, yelling, or name-calling;
- creating different expectations for individuals based on their perceived identities; and
- threatening, intimidating, or hostile acts directed at a particular sex or religious group or directed at an individual because of their sexual orientation, color or ethnicity.

Harassment does not require intent to offend. Thus, inappropriate conduct or language meant as a joke, a prank, or even a compliment can lead or contribute to harassment.

VII. PROHIBITION AGAINST RETALIATION

AUB prohibits retaliation against individuals who, in good faith, complain about, report, or assist others in reporting non-compliance with this policy. AUB also prohibits retaliation against any person who provides evidence or otherwise participates or refuses to

participate in the investigation or resolution of a complaint under this policy or any other applicable AUB policy, including but not limited to the U.S. Title IX Policy & Procedures.

These prohibitions include complaints brought to law enforcement or governmental bodies or participation in related proceedings outside of the University.

Retaliation includes, but is not limited to, any action, statement or behavior that is designed to punish an individual for making a complaint or cooperating with an investigation, or to deter an individual from making or pursuing a complaint or participating in an investigation or the resolution of a complaint.

Retaliatory conduct may include, but is not limited to, threats, intimidation, coercion, reprisals, and/or adverse actions affecting education. It does not include petty slights or annoyances.

This policy against retaliation includes a prohibition on retaliating against anyone who, in good faith complains (or encourages another to complain), testifies about, opposes, or provides information about suspected sexual harassment or discrimination based on any Protected Characteristic (a “protected activity”), including sexual and reproductive health decisions and decision making. No person shall be subject to adverse action—including the actions listed above—because they engaged in good faith in a protected activity.

Individuals subject to this policy who retaliate against anyone for engaging in a protected activity will be subjected to disciplinary action, up to and including expulsion or termination. These protections extend to those who engage in a protected activity in good faith, even if their complaints are not substantiated or do not rise to the level of a policy violation. However, individuals may be subject to disciplinary action for making intentionally false statements in connection with allegations of discrimination.

Allegations of retaliation, while a matter is pending pursuant to this policy, may be investigated separately through a new complaint and investigation, or folded into the pending investigation, based on the circumstances of the allegations.

All individuals who believe they have been subject to retaliation in violation of this policy should report their concern to the Title IX Coordinator.

VIII. COMPLAINT PROCEDURE: REPORTING VIOLATIONS OF THE NONDISCRIMINATION POLICY FOR STUDENTS ENGAGED IN AUB EDUCATION PROGRAMS OR ACTIVITIES IN THE UNITED STATES

Individuals who are aware of an instance of potential discrimination should make a report to the Title IX Coordinator in person, by mail, by telephone, online, or by email, including outside of normal business hours. Certain conduct that violates this policy may also fall within the scope of the U.S. Title IX Policy and Procedures. The Title IX Coordinator will determine the applicable procedures that apply to the alleged conduct. Where a determination is made that the U.S. Title IX Policy & Procedures should apply, the complaint will be addressed consistent with the procedures set forth in that policy.

AUB is committed to taking, and may be required by law to take, action regarding potential discrimination or discriminatory harassment even if an individual does not wish

to make a complaint. Certain AUB employees may have mandatory reporting obligations related to allegations of discrimination or harassment pursuant to other policies, including the Debs Center EEO Policy and the U.S. Title IX Policy & Procedures. Individuals should refer to those policies for further information regarding their mandatory reporting obligations.

After receiving a complaint, the Title IX Coordinator will determine the proper procedure applicable to your complaint. You should report the conduct regardless of the offender's position at AUB and should also report the conduct even if the offender is not a student or employee at AUB (for example, a vendor, guest or "temp"). Your prompt reporting is very important so that AUB can take action to stop the conduct before it is repeated. All reports will be followed up on promptly.

For complaints not subject to the U.S. Title IX Policy & Procedures or other applicable University Procedure, AUB will conduct further investigation where needed to confirm facts or resolve disputed facts. In conducting its investigations, AUB will strive to keep the identity of individuals making reports as confidential as possible.

In connection with complaints not subject to the U.S. Title IX Policy and Procedures, while the investigation process may vary from case to case, investigations will typically include the following steps: After receiving a complaint, the Title IX Coordinator, their designee, or, if the allegation involves the Title IX Coordinator, the President, will conduct a prompt review of the allegations and may take interim actions as appropriate (e.g., instructing the individual(s) alleged to have violated this policy to refrain from communicating with the individual(s) alleged to have been subjected to conduct in violation of the policy). The investigator—who is selected by the Title IX Coordinator or, if the Title IX Coordinator is the subject of a complaint, the President—will typically proceed by interviewing the individual(s) who submitted the complaint, the individual(s) alleged to have been subjected to conduct in violation of the policy, the individual(s) alleged to have violated this policy, and others identified by those individuals as witnesses or people with knowledge of the conduct at issue. The investigator may also obtain, review and preserve documents, emails or phone records relating to the allegations. Students, faculty, staff, and other members of the AUB community may be required to cooperate as needed in an investigation of any violation of this policy.

As appropriate, the individual(s) who submitted the complaint, the individual(s) alleged to have been subjected to conduct in violation of the policy, and the individual(s) alleged to have violated this policy will be notified of the outcome of the investigation.

At all times in its responses to complaints, including throughout any grievance procedures relevant to resolving allegations of discrimination, AUB will treat complainants and respondents equitably.

IX. DISCIPLINARY ACTION

Appropriate disciplinary action (up to and including expulsion) will be taken against individuals found to have violated these policies. Individuals who violate these policies may also be subject to personal legal and financial liability under applicable law. Appropriate disciplinary action will also be taken against any person who knowingly and willfully makes a false allegation concerning an alleged violation of this policy.

X. RELATED POLICY DOCUMENTS

1. Equal Employment Opportunity Policy and Policy Against Discrimination and Discriminatory Harassment applicable to employees at the Debs Center in New York City
2. AUB U.S. Title IX Policy & Procedures
3. Non-Discrimination and Anti-Discriminatory Harassment Policy (AUB Beirut)
4. Sexual Harassment Policy (AUB Beirut)
5. Sexual Harassment of Patients (AUB-MC)
6. Grievance Policy and Procedures
7. Principles of Ethical Conduct
8. Procedures to Address Formal Allegations of Sexual and Other Discriminatory Harassment
9. Responsibilities of Students and Faculty Members in Relation to Academic Integrity Student Code of Conduct

XI. ACTION OTHER INFORMATION

POLICY DOCUMENT CATEGORY: Policy

POLICY DOCUMENT OWNER: Debs Center in New York City

XII. POLICY DOCUMENT HISTORY AND REVIEW

Amended on August 1, 2024.
