

## Harassment Policy (August 6, 2017)

SEALS is committed to maintaining an organizational and operational environment that is free of harassment on the grounds of sex, race, color, religion, disability, national origin, sexual orientation, gender identity, gender expression, or any additional category adopted by the ABA Section of Legal Education and Admissions to the Bar. The following policy language is intended to apply to each of these characteristics, with the words “sexual” or “gender” used as placeholders for conduct on the basis of “race,” “religion,” “disability,” and other protected grounds identified in the prior sentence.

- 1. Definition of Harassment.** Harassment is defined as unwelcome or unwanted conduct of a sexual, racial, religious, or other protected-grounds nature, including requests for sexual favors and verbal, nonverbal, or physical conduct of a sexual, racial, religious, or other protected- grounds nature that would adversely affect the terms or conditions of a reasonable person’s interactions with SEALS or would create an intimidating, hostile, or offensive organizational or operational environment for SEALS officers, non-officer trustees, staff, volunteers, and conference attendees, including participants. Examples of harassment may include the following conduct by a representative or agent of SEALS, whether male or female: unwanted sexual advances or propositions; offering organizational benefits in exchange for sexual favors; making or threatening reprisals after a negative response to sexual advances; sexual, racial, religious, or other protected-grounds innuendo; suggestive comments; sexually, racially, religiously or other protected-grounds oriented "kidding" or "teasing;" jokes about gender-specific, racially-specific, religiously-specific, or other protected-grounds-specific traits; making sexual, racial, religious, or other protected-grounds gestures or comments; displaying sexually suggestive objects, pictures, cartoons or posters; impeding or blocking another's movement; physical contact, such as patting, pinching, or brushing against another's body; and continued requests for a date after a rejection. Conduct of this kind is strictly prohibited and will not be tolerated.
- 2. Academic Engagement.** This policy shall be interpreted in light of SEALS’s commitment to vibrant academic engagement.
- 3. Reporting Harassment.** SEALS encourages the reporting of all perceived incidents of harassment either through an informal or a formal procedural mechanism. To resolve a complaint of harassment, the complainant may notify the offender that his or her behavior is unwelcome. In addition or in the alternative, the complainant should notify SEALS by reporting the perceived incident to one or more members of the SEALS Board of Trustees not involved in the harassing incidents.

(A list of the names of and contact information for members of the SEALS Board of Trustees is available at [http://sealslawschools.org/governance/board-of-trustees/.](http://sealslawschools.org/governance/board-of-trustees/))

- 4. Board of Trustees Action.** Any trustee who receives notification of a complaint of harassment shall promptly (and in any event within one week) report the complaint to the Board of Trustees, which shall take appropriate action, including causing the complaint to be investigated under its oversight (or the oversight of a committee of the Board constituted for that purpose). The investigation shall be initiated and conducted within a reasonable period of

time (and in any event within eight weeks) after the complaint is reported to the Board of Trustees. To the extent possible, each complaint and any related interviews and documents discovered or generated during the investigative process remain confidential. The results of the investigation, including the steps taken as part of the investigation, will be reported to the Board of Trustees (or the committee of the Board to which the Board has delegated its oversight authority), which then will determine a responsive course of action. The response may include various kinds of corrective or punitive action, up to and including termination of the offender's affiliation or association with SEALS.

At the direction of the Board of Trustees, representatives or agents of SEALS may conduct follow-up interviews to determine whether the appropriate responsive steps were taken and whether issues substantiated in the investigation were resolved.

5. **Retaliation.** Anyone who retaliates against a person who reports harassment may be subject to corrective or punitive action.