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TITLE IX AND TITLE VI COMPLIANCE

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WHAT WE WILL COVER TODAY

1. THE HISTORY AND PURPOSE OF TITLE IX AND TITLE VI
2. WHAT TITLE IX AND TITLE VI COVER AT CURRY COLLEGE
3. INDIVIDUAL RIGHTS AND SUPPORTIVE MEASURES AVAILABLE
4. RESOURCES AND SUPPORTIVE MEASURES
5. YOUR ROLE AS A RESPONSIBLE EMPLOYEE
6. HOW TO RESPOND WHEN AN INDIVIDUAL DISCLOSES

HISTORY AND PURPOSE OF TITLE IX

1972 Title IX signed into law as part of the Education Amendments, prohibiting sex discrimination in any federally funded education program or activity

1992 Franklin v. Gwinnet County Public Schools: Supreme Court rules schools can be sued for damages in Title IX cases involving sexual harassment by teachers

1999 Davis v. Monroe County: Supreme Court extends Title IX liability to student-on-student sexual harassment

2020 New Title IX regulations expand procedural rights and define sexual harassment more **narrowly**

2024 Updated regulations restore **broader** protections and address gender identity

2025 2024 regulation vacated on January 2025. Reverted back to 2020 regulations



WHAT TITLE IX COVERS HERE AT CURRY

TITLE IX PROHIBITS SEX-BASED DISCRIMINATION IN ANY PROGRAM OR ACTIVITY AT CURRY COLLEGE. THIS INCLUDES:

SEXUAL MISCONDUCT	RELATIONSHIP VIOLENCE	OTHER COVERED CONDUCT
• Sexual harassment • Sexual assault • Sexual exploitation • Non-consensual recording	• Dating violence • Domestic violence • Intimate partner abuse	• Stalking • Sex-based discrimination • Gender-based harassment • Retaliation for reporting

HISTORY AND PURPOSE OF TITLE VI

1964

Title VI is enacted as part of the Civil Rights Act of 1964 during the Civil Rights Movement to address racial discrimination in federally funded programs

1970-Present

Federal agencies, including the U.S. Department of Education, begin enforcing Title VI in schools, colleges, and universities receiving federal funds

Ongoing Application:

Title VI continues to protect individuals from discrimination, harassment, and unequal treatment based on race, color, or national origin and promotes equitable access to educational resources and opportunities.

WHAT TITLE VI COVERS HERE AT CURRY

TITLE VI PROHIBITS DISCRIMINATION BASED ON RACE, COLOR, AND NATIONAL ORIGIN IN ANY PROGRAM OR ACTIVITY AT CURRY COLLEGE. THIS INCLUDES:

DISCRIMINATION

- Unequal treatment based on race, color, or national origin
- Exclusion from programs, activities, or opportunities based on protected characteristics
- Different standards, exceptions, or access to resources

HARASSMENT

- Racial slurs, epithets, or derogatory comments
- Hostile conduct directed at someone because of their race, ethnicity, or national origin
- Conduct that creates an intimidating, hostile or offensive educational environment

OTHER COVERED CONDUCT

- Discrimination based on ancestry, ethnicity, or place of origin
- Bias related to language, accent, or cultural background
- Unequal access to programs or services because of national origin
- Adverse actions against an individual for reporting discrimination

INDIVIDUAL'S RIGHTS AND PROTECTIONS

RIGHT TO A FAIR PROCESS	Both complainants and respondents are entitled to equal rights, equal access to information, and an impartial investigation and resolution.
RIGHT TO PRIVACY	Information shared during the process is kept as private as possible. Details are shared only on a need-to-know basis.
RIGHT TO SUPPORTIVE MEASURES	Individuals can access supportive measures regardless of whether they choose to file a formal complaint including no contact orders, housing changes, and counseling.
RIGHT TO INFORMED OPTIONS	Individuals have the right to know all their options (formal complaint, informal resolution, or support only) and to make their own decisions.
FREE FROM RETALIATION	No one may retaliate against an individual for reporting, participating in an investigation, or supporting another individual.

RESOURCES AT CURRY

CONFIDENTIAL

THESE RESOURCES ARE NOT REQUIRED TO REPORT TO TITLE IX:

ON CAMPUS:

- Counseling
- Health Center
- Rev. Dr. Marcus Hill (Campus Chaplain)
- HR Staff (Unless policy violation)

OFF CAMPUS:

- A New Day - Sexual Violence Victim Advocates 508-588-8255
- DOVE - Domestic Violence Services 617-471-1234

NON-CONFIDENTIAL

REQUIRED TO REPORT TO TITLE IX - THIS INCLUDES YOU:

- Office of Institutional Equity & Compliance- Stacey Hayes, J.D., M.A.
- Residential Life Staff
- Resident Advisors (RAs)
- Faculty & Staff
- Public Safety
- Athletic Coaches

SUPPORTIVE MEASURES AVAILABLE TO STUDENTS

SUPPORTIVE MEASURES ARE AVAILABLE TO ANY STUDENT REGARDLESS OF WHETHER A FORMAL COMPLAINT IS FILED:

HOUSING	Room assignments or relocation, changes to resident hall access
ACADEMIC	Class schedule, extensions, leaves of absence, incomplete grades
SAFETY	No-contact orders, campus escort services, increased security presence
EMOTIONAL	Counseling referrals, advocacy support, connection to community resources
CAMPUS ACCESS	Changes to work assignments, restrictions on campus locations

SUPPORTIVE MEASURES AVAILABLE TO EMPLOYEES

SUPPORTIVE MEASURES ARE AVAILABLE TO ANY INDIVIDUAL REGARDLESS OF WHETHER A FORMAL COMPLAINT IS FILED:

WORKPLACE ADJUSTMENT	Changes to work schedule, modified work location, adjustments to supervisory or reporting structures
LEAVE	Temporary leave options, flexible scheduling for appointments, counseling, legal proceedings etc.
SAFETY	No-contact orders, campus escort services, increased security presence
EMOTIONAL	Counseling referrals, advocacy support, connection to community resources
CAMPUS ACCESS	Changes to work location, adjustments to meeting participation

YOU ROLE AS A RESPONSIBLE EMPLOYEE

AS AN EMPLOYEE, YOU SHOULD:

- Listen with care and without judgement
- Believe the individual and affirm their courage in sharing
- **Tell the individual you are a responsible employee and must report**
- Report the disclosures to the OIEC
- Connect the individual to confidential resources
- Follow up with OIEC or HR Staff
- Document what was shared accurately and promptly

AS AN EMPLOYEE, YOU SHOULD NOT:

- Investigate or ask probing questions about what happened
- Promise confidentiality - you cannot keep the promise
- Tell other employees what was shared
- Pressure the individual to file a formal complaint
- Contact the accused individual on the complainant's behalf
- **Make promises about what will happen**
- Handle this alone

RESPONDING TO A DISCLOSURE: STEP BY STEP

1	CREATE SAFETY	Find a private space. Sit down. Give the individual your full attention. Turn off your phone.
2	LISTEN AND AFFIRM	“Thank you for telling me. I believe you. What happened to you is not your fault."
3	BE TRANSPARENT ABOUT YOUR ROLE	“ I want you to know that I am a responsible employee which means I am required to share what you’ve told me with the OIEC. I won’t share it with anyone else.
4	SHARE THEIR OPTIONS	Let them know they can speak with a confidential resource (Counseling Center, DOVE, A New Day) and that supportive measures are available regardless of whether they file a complaint.
5	FOLLOW UP AND REPORT	Contact your supervisor and report to OIEC as soon as possible. Document what the individual shared. Use EXACT words, not your interpretation. The goal is accurate reporting.

REPORT WRITING

COMPLETE INCIDENT REPORT

- Include all facts, observations and statements
- The report should be complete, and all information should be in the initial report
- Submit reports promptly and accurately

DO NOT INVESTIGATE OR ADJUDICATE

- Employees are not responsible for determining what happened
- Avoid assigning blame or deciding policy violations
- Focus on support, safety and accurate documentation

DO NOT PROMISE OUTCOMES

- Do not promise specific results (OIEC will handle, removal from housing, discipline)
- Explain that the appropriate team will review the report and discuss available options

REPORT VS. FORMAL COMPLAINT

- A report shares information about a concern or incident
- A formal complaint is a request for the institution to begin a grievance process under the applicable policy
- Not every report becomes a formal complaint

UNDERSTANDING BEING TRAUMA INFORMED

TRAUMA AFFECTS HOW PEOPLE THINK, REMEMBER, AND COMMUNICATE. UNDERSTANDING THIS HELPS YOU RESPOND WITH CARE.

DELAYED DISCLOSURE

Individuals often wait days, weeks, or months before telling anyone. Delayed disclosure does not mean the incident did not happen.

INCONSISTENT MEMORY

Trauma affects memory. An individual may not remember details in order or may remember different times. This is normal and not a sign they are lying.

FLAT OR UNEXPECTED AFFECT

An individual may seem calm, laugh, or appear unaffected. Trauma responses vary widely. There is no “correct” way to react to a traumatic event.

SELF-BLAME

Many survivors blame themselves. Your role is not to debate this. Simply affirm that what happened was not their fault and that they deserve support.

LANGUAGE THAT HELPS VS LANGUAGE THAT HARMS

AVOID SAYING

- “Are you sure that’s what happened?”
- “Why didn’t you leave or say something?”
- “I won’t tell anyone, I promise.”
- “Have you been drinking?”

WHAT HAPPENED?

- “I believe you”
- “What happened is not your fault”
- “I have to share this with OIEC, but can be with you through this, as a support, if you want”
- “You don’t need to explain yourself to me right now”
- “You have options. Let me tell you what they are”

LET'S PRACTICE: SCENARIO DISCUSSION

THE SCENARIO:

A staff member mentions to you, almost in passing, that a colleague regularly makes comments about a coworker's accent and "where they're really from," and it's been going on for months. The staff member isn't sure it's "a big deal" and doesn't want to make things awkward.

DISCUSSION QUESTIONS:

1. Does this need to rise to a formal complaint before you report it?
2. What makes this a Title VI concern rather than just a personality conflict?
3. How do you respond to "I don't want to make it awkward"?

LET'S PRACTICE: SCENARIO DISCUSSION

THE SCENARIO:

During office hours, a student tells you they were sexually assaulted by another student at an off-campus party several weeks ago. They ask you to keep it "just between us" and say they don't want to get anyone in trouble.

DISCUSSION QUESTIONS:

1. Can you promise to keep this confidential?
2. What do you say to the student in the moment?
3. What happens after this conversation ends?

AFTER YOUR REPORT: WHAT HAPPENS NEXT

SUPPORTIVE MEASURES	OIEC will assess whether supportive measures are needed regardless of whether the individual chooses to proceed formally.
INDIVIDUAL'S CHOICE	The individual decides whether to file a formal complaint, pursue informal resolution or receive support only. This is their decision to make.
RIGHT TO SUPPORTIVE MEASURES	Individuals can access supportive measures regardless of whether they choose to file a formal complaint including no contact orders, housing changes, and counseling.
YOUR ROLE GOING FORWARD	Continue to be supportive presence for others. Do not discuss the matter with other others. Check in on the individual's well being without pressuring them about the process.
TAKE CARE OF YOURSELF	Supporting individuals through difficult situations is emotionally demanding. Use your own support resources: your supervisor, the Counseling Center, and OIEC are here for you too.

KEY CONTACTS AT CURRY

OFFICE OF INSTITUTIONAL EQUITY & COMPLIANCE

Stacey Hayes, J.D., M.A.
OIEC Director
stacey.hayes@curry.edu, 617-333-2212,
King Building G05

TITLE IX COORDINATOR

Dr. Juan Hernandez
VP Diversity & Title IX Coordinator
juan.hernandez@curry.edu, 617-333-2394,
King Building G06

COUNSELING CENTER

617-333-2182
617-333-2008 (after hours)

WELLNESS

Elizabeth Helmreich, MPH
Director Community Wellness &
Violence Prevention
elizabeth.helmreich@curry.edu

EMERGENCY/AFTER HOURS

Public Safety 617-333-2222 or
911

OFF CAMPUS

A New Day - Sexual Violence Victim
Advocates, 508-588-8255
DOVE - Domestic Violence Services,
617-471-1234

YOU ARE NOT ALONE IN THIS WORK.

YOUR ROLE IS NOT TO INVESTIGATE, ADJUDICATE OR FIX WHAT HAPPENED. YOUR ROLE IS TO LISTEN, BELIEVE, AND CONNECT.

EMPLOYEES ARE OFTEN THE FIRST PEOPLE STUDENTS OR COLLEAGUES TURN TO WHEN SOMETHING CONCERNING HAPPENS.

QUESTIONS?

PLEASE TAKE A MINUTE TO FILL OUT OUR POST TRAINING SURVEY



THANK YOU!



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