



## **Policy on Diversity, Inclusion and Verbal Conduct**

### **Central Seminary's (CBTS) Commitment**

All students and employees of CBTS should expect to feel safe and respected at all times in their associations with this school, fellow students, and with faculty, staff, administrators, and Board members. If for any reason you do not, CBTS will provide resources for supporting you and helping you take action.

CBTS is committed to providing educational and working environments characterized by civility and mutual respect, enabling students, faculty, administrators, and staff to relate with each other through bonds of intellectual dependence and trust. Discrimination and/or harassment of another member or group within the CBTS community is antithetical to such community and will not be tolerated.

Title IX regulations are enforced throughout the CBTS educational system, with the Vice President for Academic Affairs or Vice President of Finance and Administration's offices holding special responsibilities for ensuring compliance with the seminary's policies regarding nondiscrimination and harassment.

CBTS's nondiscrimination and harassment policies apply to all members of the CBTS community, including third parties (i.e., individuals who are neither students nor employees, e.g., guests, consultants, contractors, etc.). Conduct that occurs in the process of application for admission also falls under these policies. In addition to CBTS's policies, many forms of discrimination and harassment are prohibited by federal, state, and local laws and could result in criminal prosecution and other penalties.

### **CBTS Nondiscrimination Policy**

Central Baptist Theological Seminary pursues and embraces a nondiscriminatory policy with regard to employment and educational programs. Our school endeavors to comply with Title IX of the Education Amendments of 1972 which prohibits discrimination on the basis of age, disability, ethnicity, gender, gender identity, genetic information, national origin, race/color, religion, sexual orientation, or veteran status. Equal opportunity extends to all aspects of academic and employment relationships, including hiring, promotion, terminations, compensation, benefits and other terms and conditions of employment. The seminary complies with federal, state and local equal opportunity laws and strives to keep the workplace free from forms of illegal discrimination, harassment, and verbal conduct.

### **Reporting Discrimination and/or Harassment**

Complaints of discrimination, harassment, and/or offensive verbal conduct may be reported to and/or pursued with the Vice President for Academic Affairs or Vice President of Finance and Administration. Forms for this purpose are available in the Employee Handbook, Faculty Guidelines and Expectations (handbook), Student Catalog, and the CBTS.edu website or might be reported in person or via phone contact. Depending upon the identity of the person making the report, the complaint might be referred to CBTS professionals trained to give

support and guidance relative to matters of discrimination and/or harassment. CBTS exercises care to ensure that matters of gender, language, race, ethnicity, or other factors will not be barriers to the reporting person's sense of safety and support in making a complaint and in freely explaining what has occurred. Referring to qualified CBTS personnel enables us to match the person reporting with an official with whom she or he can feel comfortable. If the complaint is from a student or employee at a distance teaching site, every effort will be made to provide local support through the site director and/or some other suitable and trained local person.

The Vice President for Academic Affairs or Vice President of Finance and Administration, all staff in these offices, all site directors, and all standing faculty receive comprehensive annual training on:

- relevant laws, regulations, and disciplinary codes
- the dynamics and patterns of discrimination and harassment
- the importance of confidentiality
- fair process and impartiality
- safety considerations when determining interim measures, and
- appropriate criminal and disciplinary sanctions if necessary

You might choose any of these persons to assist you with a complaint of discrimination and/or harassment. (see the section of this document explaining the complaint process once activated)

## **Definitions**

CBTS values equality of opportunity, human dignity, and racial/ethnic and cultural diversity. Accordingly, CBTS prohibits discrimination, harassment, and or verbal conduct on the basis of age, disability, gender, genetic information, national origin, race/color, religion, sexual orientation, or veteran status. CBTS will not engage in retaliation against any person who makes a claim of discrimination, harassment, or offensive verbal conduct who provides the information needed for such an investigation.

### *Discrimination*

Discrimination is understood in this policy as conduct directed at a specific individual or group of individuals that subjects the individual or group to treatment that adversely affects their employment or education on the basis of their age, disability, ethnicity, gender, gender identity, genetic information, national origin, race/color, religion, sexual orientation, or veteran status.

### *Harassment*

Harassment refers to verbal, visual, or physical conduct that is directed at an individual or group because of age, disability, ethnicity, gender, gender identity, genetic information, national origin, race/color, religion, sexual orientation, or veteran status when such conduct is severe, pervasive, and/or persistent so as to have the effect of interfering with an individual's or group's academic or work performance or of creating a hostile academic or work environment.

- Harassment may occur through a wide range of conduct, including but not limited to verbal, visual, physical, or electronic means, when the conduct is severe or pervasive and objectively or subjectively has the effect of:
  - Unreasonably interfering with an individual's work or equal access to education or employment,
  - Creating an intimidating, hostile, or offensive work or academic environment
- Harassment might occur on CBTS's Shawnee campus, at educational locations, through digital delivery methods, or at other times and places connected with CBTS operations, whether or not the activity is part of an academic course. Whenever, wherever, and however CBTS-related community gathers for CBTS-connected purposes can be subject to this policy.
- Harassment can occur between people of the same or different protected group statuses. Any CBTS student or employee of any identity status is subject to CBTS's discrimination, harassment, and/or verbal conduct policy.

### *Verbal Conduct*

Verbal conduct refers to oral, written, or symbolic expression that:

- personally describe or is personally directed at a specific individual group of identifiable individuals, and
- is not necessary to an argument for or against the substance of any political, religious, philosophical, ideological, or academic idea.

CBTS expects all students and employees to model Christian moral conduct, including nondiscrimination, inclusion, and respectful verbal conduct. The Seminary's standards of conduct may exceed those of society in general. When constitutionally protected speech is implicated, CBTS's expectation is that members of its community will adhere to the higher standards of civility, Christian love, and mutual respect regardless of what the First Amendment might legally allow. Freedom to express diversity of opinion and belief does not mean we are free to do so in ways that create an intimidating, hostile, or offensive work or academic environment.

### **Strategies for Combating Discrimination, Harassment, and Offensive Verbal Conduct**

#### *General Strategies*

- Promote behaviors and values of mutual respect for all persons. Don't tolerate disrespect or pressure in your community of associates. Even small incidents of disrespect such as discrimination, harassment, or offensive verbal conduct can contribute to a negative community climate.
- If you see or hear discrimination, harassment, or offensive verbal conduct that causes you concern, check it out. Call on friends, associates, supervisors, and others to help if necessary.
- If you are in a position of authority over another person or group, you have a responsibility to establish and maintain a respectful environment. If you are a supervisor, you must report any discrimination, harassment, or unbecoming verbal conduct that comes to your attention to a Title IX coordinator (the Vice President for Academic Affairs or Vice President of Finance and Administration office).

- Watch for patterns, not just isolated actions. Discrimination, harassment, or offensive verbal conduct can take the form of patterns of behavior that might not be concerns in isolation. Pay attention to repeated disrespect, intimidation, and threatening or offensive verbal conduct even if these actions seem small in isolation.

#### *Strategies for Combating Discrimination*

- Stay engaged – Make a personal commitment to remain morally, emotionally, intellectually, and socially involved in communication with individuals and groups even when they are different from yourself and may require extra effort to understand and engage collegially.
- Expect and accept non-closure – you likely will not reach closure in your understanding of many components of age, disability, ethnicity, gender, gender identity, genetic information, national origin, race/color, religion, sexual orientation, or veteran status differences or in your interactions with these differences. Usually, we deal with challenges by searching for solutions. In matters of discrimination and their associated deep-seated attitudes and assumptions, the solution is revealed in the process of dialogue itself. Such open communication must be a continuous process. Growth in nondiscrimination is a process not a single event.
- Risk honest engagement – Genuine engagement that produces growth requires that you be honest about your thoughts, feelings, and opinions and not hide behind a smokescreen of saying only what you think others want to hear, while leaving underlying convictions unchallenged. Honest engagement can and should be done with respect for the other person in spite of your differing positions.
- Experience discomfort – Courageous engagement and conversation necessarily creates discomfort. Push yourself to have real dialogue that leads to growth. Open up and examine your core beliefs about age, disability, ethnicity, gender, gender identity, genetic information, national origin, race/color, religion, sexual orientation, or veteran status.
- Commit to CBTS's value that all are entitled to study and work in a respectful environment. If elements are present that feel hostile, look for ways to intervene. Seek the support of colleagues, supervisors, administrators, and faculty if you need help doing this.

#### *Strategies for Preventing Harassment*

- Promote open dialogue – help fellow students and workers find their voice, appreciate their own identities and backgrounds, and develop acceptance for the diversity among their peers.
- Articulate rules and expectations supporting respect for other persons and their differences.
- Promote empathy, diversity, and social and emotional learning.
- Encourage students and workers to contribute and/or initiate peer-led inclusion activities.
- Commit to CBTS's value that all are entitled to study and work in a respectful environment. If elements are present that feel hostile, look for ways to intervene. Seek the support of colleagues, supervisors, administrators, and faculty if you need help doing this.

#### *Strategies for Combating Offensive Verbal Conduct*

- Don't let disrespectful (e.g., hate) speech go unchallenged – Inaction frequently is viewed as apathy or worse as support for the bigotry.

- Keep community strong – disrespectful talk can divide communities. Find ways to pull together in opposition to offensive verbal conduct.
- Support those subjected to offensive talk – but try not to make decisions on behalf of recipients of offensive verbal conduct without their actual input. Engage the victim’s (or victims’) needs and wishes.
- Teach tolerance –offensive verbal conduct and bias crises bring anger, pain, and distrust. They also offer opportunity for learning. Convert offensive verbal conduct into an occasion for teaching acceptance and fighting ignorance.
- Maintain momentum – The American public seems to have a very short memory once an incident or crisis is past. An incident or incidents of offensive verbal conduct is not the end of the matter once a conflict is past. Keep the discussion going among peers and with other persons.

### *Bystander Intervention*

Discrimination, harassment, and hateful verbal conduct often is permitted by cultural patterns of disrespect, pressure, and aggression. We can interrupt those patterns through small (or large) interventions:

#### Prelude to Intervention

- In community life, be attentive to behaviors and speech that make you feel uncomfortable. Watch for signs of discrimination, harassment, or disrespect. Don’t ignore “little” things.
- Decide whether someone should intervene if such conduct is evident. Does someone need help? Is the situation moving in a bad direction? If possible, confer with the person you think is in need of help.
- Make a plan. Determine who might be in the best position to take action, you, a friend, an official, or someone else.
- Follow through with action. Be attentive to others trying to help, and determine whether joint action might be better than your individual action alone. Begin with the smallest possible intervention that seems reasonable for the situation and increase the level as conditions warrant.

### **Options and Rights Should You Experience Discrimination, Harassment, and/or Offensive Verbal Conduct**

Discrimination in its various forms can seriously impact personal, professional, and academic life. Should you experience discrimination, harassment, or offensive verbal conduct, CBTS encourages you to take action to secure the help and support you need. Such action might include filing a grievance with the Vice President for Academic Affairs or Vice President of Finance and Administration’s office and thereby pursuing disciplinary sanction. In severe cases filing a police report and pursuing criminal investigation might be appropriate.

### **Steps to Consider Taking Should You Experience Discrimination, Harassment, or Offensive Verbal Conduct**

- Get support – the Vice President for Academic Affairs or Vice President of Finance and Administration and others at CBTS can provide information and advocacy as well as support.

- Collect and preserve evidence – voicemail, emails, and text messages can be important. Even if you do not initially think you will pursue disciplinary or criminal complaints, it is good to keep those options open by securing evidence.
- Report the incident – if you or someone you know has experienced discrimination, harassment, or offensive verbal conduct involving a member of the CBTS community, you may file a report through the office of the Vice President for Academic Affairs or Vice President of Finance and Administration. This allows administrators to respond appropriately to your case and to broader patterns of inappropriate behavior. The Vice President for Academic Affairs or Vice President of Finance and Administration will be able to supply you with written materials outlining your options, rights, and available services. Making a report usually does not commit you to pursuing a complaint. In rare occasions where serious threat exists to an individual or the larger community, administrators might be required by law to take independent action.
- Pursue a complaint – the process for pursuing a complaint and the complaint options are described below. You have a range of options to pursue: criminal and disciplinary, formal and informal.
- Continue getting support – the impact of discrimination, harassment, and/or offensive verbal conduct might have on you can ebb and flow over time as different settings and challenges arise. Don't conclude that having overcome the initial trauma means you will not need additional support later.

### **Seeking Accommodations, Remedies, and Protective Measures**

If you experience discrimination, harassment, and/or offensive verbal conduct, CBTS can take steps to help minimize the impact of the incident(s), decrease the likelihood of recurrence, and provide a safe educational and work environment. Many steps can be taken regardless of whether or not you choose to pursue a complaint. Measures can include no contact orders, changes to employment or academic assignments, and temporary suspensions. Use the help available through the Vice President for Academic Affairs or Vice President of Finance and Administration's offices to seek accommodation when needed.

### **Processes for Pursuing a Complaint**

Complaints of discrimination, harassment, and/or hateful verbal conduct may be reported to and/or pursued with the Vice President for Academic Affairs or Vice President of Finance and Administration. Forms for this purpose are available in the Employee Handbook, Faculty handbook, Student Catalog, and the CBTS.edu website or might be reported in person or via phone contact. (See the section on "Reporting discrimination, harassment, and/or hateful offensive conduct" for additional information)

Depending upon the degree of urgency the situation might require, the following steps might be taken in response to a complaint:

1. If you or someone you know is in immediate threat or danger of violence, call 911 and seek help from local authorities. You might later consult with administrative personnel and/or file a complaint report with CBTS if you would choose to do so, but the immediate safety of all parties should be your first concern.
2. Every effort is made to safeguard the privacy of the complainant, but some types of discrimination, harassment, and/or offensive verbal conduct might require notification of authorities. When you report misconduct be aware that CBTS personnel must abide by federal laws and the laws of the state in which the misconduct occurred.

3. You have two options when filing a report of discrimination, harassment, and/or hateful verbal conduct:
- a. Informal Complaint – this complaint would initiate action either by the Vice President for Academic Affairs or Vice President of Finance and Administration’s office to conduct an informal resolution process. This would not include formal investigation or a formal hearing. It also would not result in a formal finding or discipline, but could result in other remedial actions. The choice to pursue an informal resolution does not preclude the complainant’s option of pursuing a formal complaint in the future.
  - b. Formal Complaint – the formal complaint process can involve several stages and procedures:
    - i. **Initial Inquiry:** When any charges of discrimination, harassment, and/or offensive verbal conduct are brought by a student or academic personnel, the Provost and a committee of two (2) faculty members and/or a staff member (depending upon the persons involved in the complaint, the committee members are chosen to ensure a fair hearing) appointed by the Provost, will conduct an informal inquiry to establish the facts in the complaint and to determine what further actions are needed. If the informal inquiry determines that a Hearing Committee is needed, one will be formed and the complaint will move to the formal inquiry stage. If the complaint does not involve students or academic personnel, the Executive Vice President will initiate a comparable process from that office.
    - ii. **Formal Inquiry:** The following actions are involved in a formal inquiry:
      1. The Vice President for Academic Affairs will inform in writing all persons included in the complaint of the charges involved. If the complainant is a non-academic employee, the Vice President of Finance and Administration will form the committee.
      2. A Hearing Committee of CBTS persons trained in discrimination, harassment, and/or hateful verbal conduct matters will be formed to conduct the formal inquiry. In the academic division that committee will include the Vice President for Academic Affairs as chair and three (3) faculty and/or academic staff members. If outside the academic division, the Vice President of Finance and Administration will form the committee. In that case the committee will consist of the Vice President of Finance and Administration (chair) and three other employees chosen by the Vice President of Finance and Administration.
      3. The Hearing Committee will conduct a formal inquiry to hear the charges and the accused’s defense. A record of the proceeding will be maintained. The Hearing Committee will prepare its findings regarding the grounds for disciplinary action in writing. If CBTS policy has been violated, disciplinary actions might be imposed including required special awareness training, censure, probation, leave of absence, or dismissal from the seminary (if a student), or reassignment or termination (if an employee).
      4. The formal complaint process normally should be concluded within 60 days. If special circumstances require more time, all parties will be notified in writing of the new timeframe.

### iii. Appeal

1. Either the complainant or the respondent might appeal a decision of the Hearing Committee to the President of CBTS. The President might either review the records of the Hearing Committee's findings and decide the appeal on the basis of existing information or form an Appeals Fact-finding Committee and conduct an Appeals Hearing. There will be a written record of the hearing and testimony.
2. The Appeals Fact-finding Committee will prepare its findings regarding the actions and decisions of the former Hearing Committee together with additional findings they might secure and will convey these findings to the President.
3. The President will examine all records and reports, requesting additional interviews and testimony if needed, and render a decision either to uphold the earlier Hearing Committee's decision or to modify or reverse that decision. This decision is final.
4. The appeals process normally should be concluded within 60 days. If special circumstances require more time, all parties will be notified in writing of the new timeframe.
5. There should be an avoidance of public statements by all parties involved in the complaint until the proceedings are complete and announcements of the final decision have been made.

### **Discrimination, Harassment, and Offensive Verbal Conduct Orientation and Training**

- All CBTS students in all locations and all mediums of delivery will receive orientation on how to prevent and respond to discrimination, harassment, and/or offensive verbal conduct at the beginning of their program of study. This might occur as part of an initial orientation class or as part of the "Foundations for Seminary Studies" or correlated classes.
- All CBTS employees, including faculty and staff, will receive orientation on how to prevent and respond to discrimination, harassment, and/or hateful verbal conduct either in person or via digital conferencing technology in August of each year.
- The following persons and selected others receive special training in August of each year that prepares them to support and advise persons reporting discrimination, harassment, or offensive verbal conduct. Vice President for Academic Affairs or Vice President of Finance and Administration, all staff in these offices, all site directors, and all standing faculty receive comprehensive annual training on:
  - relevant laws, regulations, and disciplinary codes
  - the dynamics and patterns of discrimination, harassment, and/or offensive (e.g., hate) verbal conduct
  - the importance of confidentiality
  - fair process and impartiality
  - safety considerations when determining interim measures, and
  - appropriate criminal and disciplinary sanctions