



OCRTIX Legal Compliance

Annual Training by Office of General Counsel

November 2025



OVERVIEW

1. Policy as Playbook
2. Bias and Impartiality
3. Maintaining Objectivity
4. Confidentiality
5. Climate Concern Procedures

The above topics have been selected to address common questions encountered in 2024-2025 and annual regulatory training requirements. By the conclusion of this training, you will have a detailed understanding of these five essential principles.

OVERVIEW

1. Policy as Playbook

- a. Let Policy Language Be Your Guide
- b. Frequent Use Sections
- c. Definition of Sexual Harassment
- d. Scope of GVSU's Programs and Activities
- e. Grievance Process: Understanding Flow

2. Bias and Impartiality

- a. Self-Assessment Worksheet
- b. Challenging Your Own Assumptions

3. Maintaining Objectivity

- a. Warning Signs You're Getting Pulled Into the Case
- b. Reset Script: How to Pull Yourself Back Out

4. Confidentiality

- a. Federal Regulatory Requirements
- b. Policy Requirements
- c. FERPA considerations
- d. Business Reason to Know Defined
- e. Common Pitfalls to Avoid

5. Climate Concern Procedures

- a. Climate Concern Assessment
- b. Steps for Processing a Climate Concern

Policy as Playbook





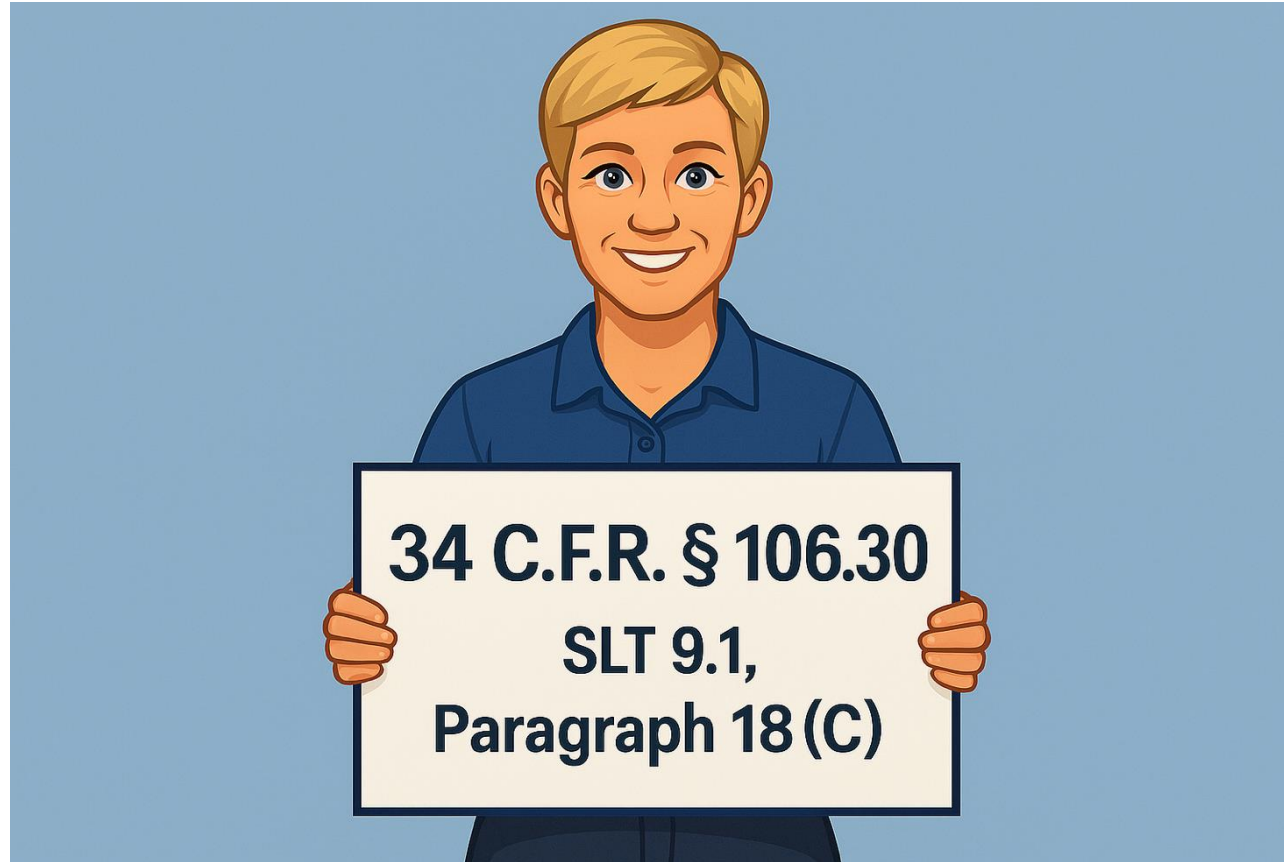
Let Policy Language Be Your Guide:

Every action taken as employees of the OCRTIX must be policy-aligned, informed by the law, and equity-centered.

Frequent Use Sections: Each team member must master the parts of the policy that they use most.

“Strong familiarity with the policy protects the integrity of the process and defensibility of the case outcome.”





Let's review the policy definition of **sexual harassment** which is created based on the federal regulations and updated as legally required.

Scope of GVSU's Programs and Activities: understanding when conduct must be addressed by the OCRTIX.

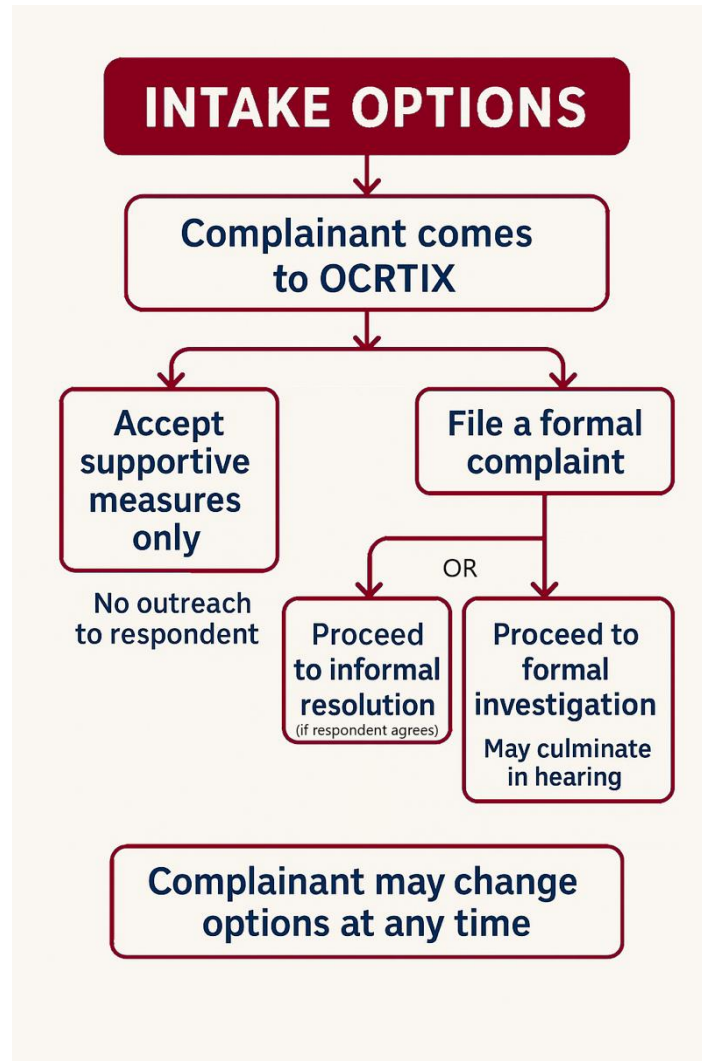


On-Campus University events clearly constitute GVSU programs and activities.

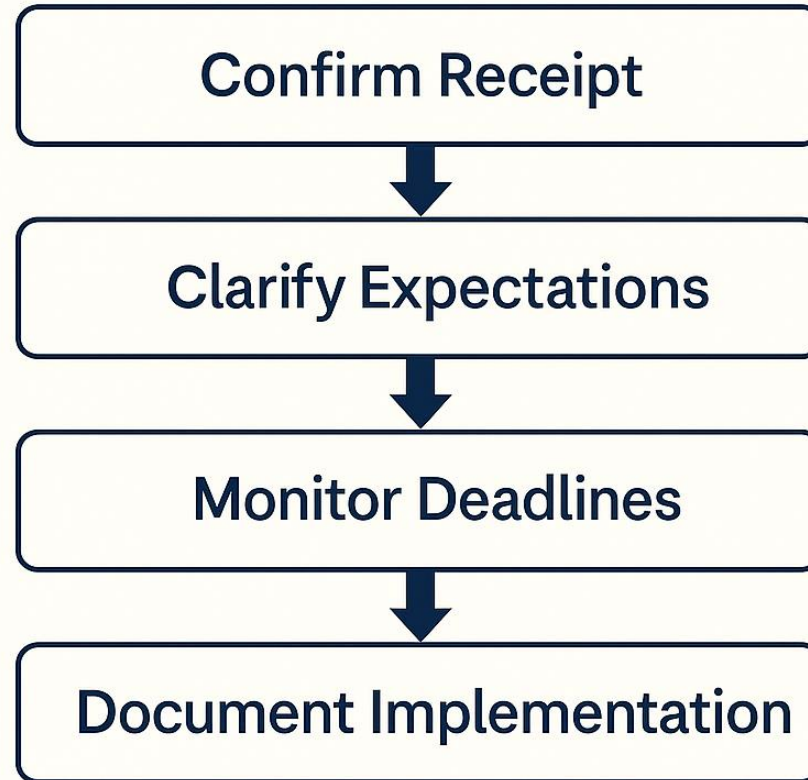


Off-Campus events require careful consideration of whether GVSU exercises sufficient control over the respondent and the context.

Understanding the Flow of the Grievance Process: Intake



Wrap-Up/Hand-Off



Bias and Impartiality



Engage in **Self-Assessment** prior to beginning work on a case to evaluate any potential blind spots and determine whether you should recuse yourself from work on the case.

See the “*Know Yourself Before You Know The Case*” Worksheet

Regularly **Challenge Your Own Assumptions** to avoid bias behaviors throughout your role in the case.

- Recognize the difference between evidence and expectation
- Resist the urge to fill in gaps with your own interpretation
- If you find yourself forming early impressions, reground yourself in neutrality
- Be careful to steer yourself away from common assumptions that may come to mind naturally

Maintaining Objectivity





Objectivity is the discipline of maintaining enough professional distance to evaluate every fact with clarity and fairness.

Warning Signs You're Getting Pulled Into the Case

Learn to recognize emotional, cognitive, behavioral, and process **warning signs** which indicate you're getting pulled into the case, leaning in a problematic direction.



Warning Signs You're Getting Pulled Into the Case



Reset Script: What to Do to Pull Yourself Back Out

Step 1: Pause

"I'm noticing I'm beginning to lean. This is my signal to step back before it affects my judgment."

Take a few deep breaths and step away from the material briefly.

Step 2: Reaffirm Your Role

"My job is not to determine who I relate to more. My job is to gather facts, apply policy, and maintain fairness."

This statement resets your professional mindset.

Step 3: Re-ground in the Policy

"Let me return to the exact language in the policy. What does the policy require at this stage? What evidence, information or facts do I still need to collect?"

Re-check definitions, procedural steps, and required notices to ensure consistency in application.

Step 4: Revisit the Standard

"Credibility is evaluated based on evidence, corroboration, and demeanor, not on my personal feelings or assumptions."

This helps shift away from emotional logic back to procedural logic.

Step 5: Reality-Check With Yourself

"Am I giving both parties equal space and scrutiny?", "Am I avoiding hard questions?", "Am I interpreting evidence neutrally?"

If any answer is "no," it's time to reset.

Step 6: Consult When Needed

If the behavior or leaning persists "I need to check in with leadership or another colleague to ensure objectivity moving forward."

Consultation is a professional safeguard, not a sign of weakness.

Step 7: Proceed With Reinforced Neutrality

"I am returning to this case grounded in facts, fairness, and the policy, not my emotions."

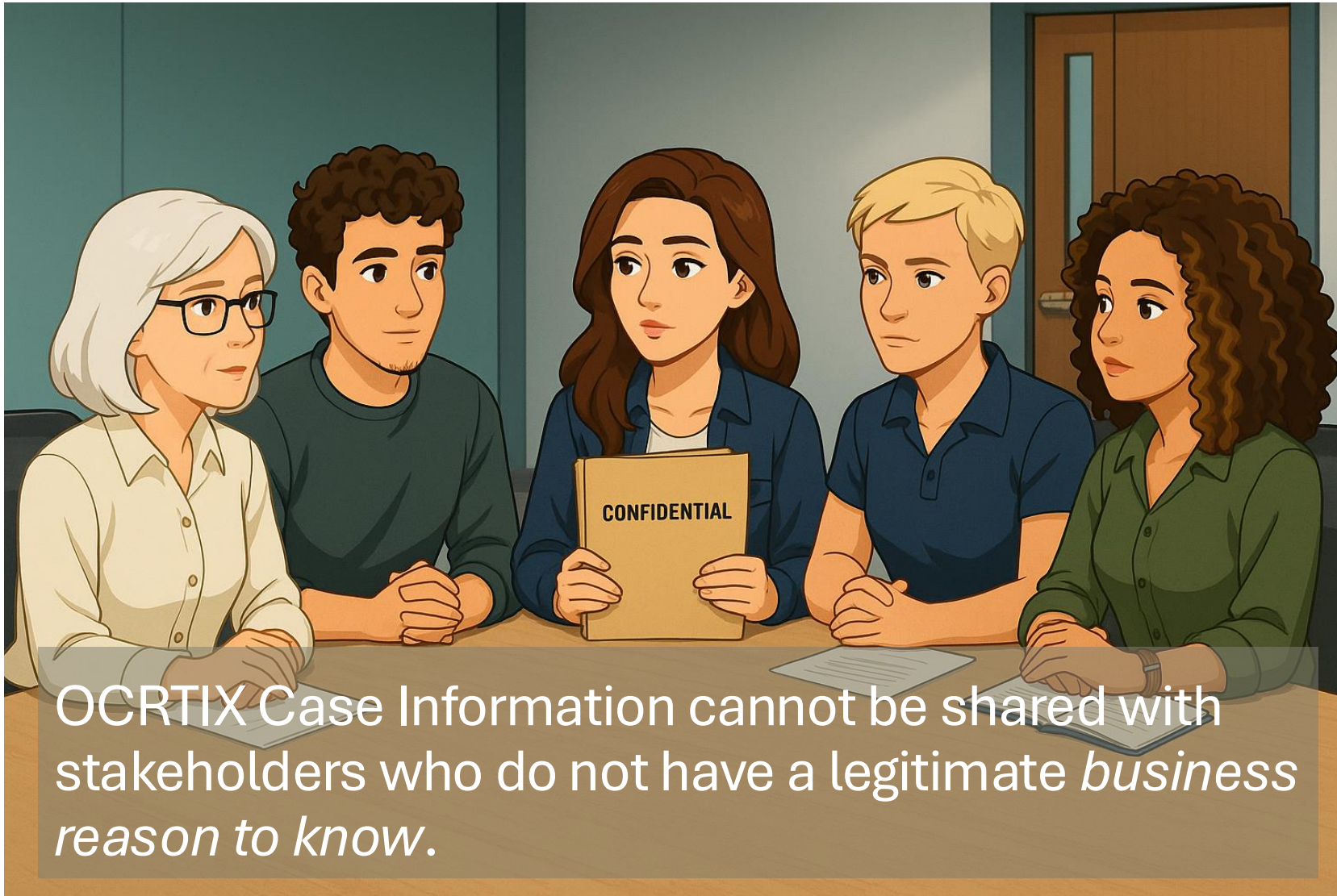
This final affirmation closes the loop and re-establishes your neutrality.

Confidentiality





Confidentiality is required by federal regulations, federal law, and University policy.



OCRTIX Case Information cannot be shared with stakeholders who do not have a legitimate *business reason to know*.

A person has a legitimate **business reason to know** case information if they seek the information to perform a task under their job function, or under Title IX, University policy, or law, ***and*** the task cannot be completed without receiving that information.

Climate Concern

P R O C E D U R E





Addressing climate concerns require both urgency and patience. We stop immediate harm and work toward long-term prevention.

Steps for Processing a Climate Concern

1. Document the report: maintain incident details, date(s), context, location, affected identity groups. Document everything thoughtfully, even keeping track of the close-out of a climate concern is part of our institutional risk management.

2. Notify appropriate partners: depending on the nature of the concern, coordinate with Housing & Residence Life, Student Life, Inclusion & Equity, Facilities, Communications (for community messaging), and/or Human Resources (for employees).

3. Design appropriate intervention(s):

- Educational programming (dialogues, workshops)
- Environmental remediation (removal of offensive artifact, graffiti cleanup)
- Communication campaigns (Raise awareness of reporting, affirm inclusion)

6. Periodic review of data to inform policy, training and outreach: quarterly or semi-annually review the data to look for frequency of reports by location, group, or incident type, repeat concerns in specific units, halls, student orgs, and patterns of language, symbolism, or behavior that suggest escalation. Use the findings to develop training, policy adjustments, or group-targeted outreach.

5. Escalate if individual misconduct surfaces: If the climate investigation reveals a policy violation with identifiable parties, OCRTIX may pivot to open a formal complaint/investigation process.

4. Follow-up with the reporter(s): When possible, inform individuals that the University has initiated a climate-focused response, given insufficient information to initiate a conduct process. Emphasize available support.

7. Close the loop for accountability: At the conclusion of a climate concern process, OCRTIX (in partnership with other University stakeholders) should report back to senior leadership on actions taken, lessons learned, and next steps.

Consider in consultation with SLT, Legal and University Communications whether appropriate to provide anonymous aggregated feedback to the community (e.g., "We received multiple reports regarding X, we responded by Y, and we will monitor further").

Questions?