

Employee Handbook

July 1, 2022 – June 30, 2023

Policies & Procedures Manual for Great Lakes Christian College Employees

Great Lakes Christian College, an institution of higher education affiliated with Christian Churches/Churches of Christ, seeks to glorify God by preparing students to be servant-leaders in the church and world.

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Section A: Introduction

History of the College

Over a generation ago, men and women of God were deeply concerned with the lack of vitality and the shrinking numbers of Christian Churches/Churches of Christ in Michigan. Their concern led to plans for founding Great Lakes Bible College, which came into being in 1949 at Rock Lake, near Vestaburg, Michigan. Twelve students were enrolled during the first year and their classes convened in the log cabin of Ralph R. Woodard, the first President of the College.

In 1951, the young College purchased a nearby eighty-acre farm and converted it into the first campus. Recognizing the advantages of a more urban location, the Trustees decided to move to the capital city, Lansing, in 1958. The College occupied the Dodge Mansion for fourteen years. In 1970, the College purchased a forty-acre site on the west edge of Lansing, and the first buildings were constructed for use in 1972. Additional land was later added, and facilities have been constructed as needed. In 1992, the College name was changed to Great Lakes Christian College.

In 2003, the College received accreditation with The Higher Learning Commission. In 2017-2018, and 2022 the College completed assurance argument evaluations for re-accreditation with The Higher Learning Commission.

The Doty Center was built in 2007. This facility is designed to accommodate large events and athletic contests. This multi-purpose gymnasium is named after the late Dr. Brant Lee Doty who was a professor, dean, and chancellor of GLCC. This building will continue his legacy of service to students and constituents in the Lansing area and beyond. The newest construction is the Knowles Learning Center. The first phase (the faculty office suite) is completed. The Knowles Learning Center is a facility that provides opportunity for the College to expand the capacity of learning for past, current, and future students.

The impact of GLCC is felt far and wide. Our alumni can be found in 40 of the United States and in many foreign countries. The Michigan churches, in particular, are impacted by our graduates who serve as preachers, youth ministers, music ministers, and Christian education directors. Since 1949 years the College continues to be true to her mission of training students to be servant leaders in the church and world.

Mission Statement

Great Lakes Christian College, an institution of higher education affiliated with Christian Churches/Churches of Christ, seeks to glorify God by preparing students to be servant-leaders in the church and world.

Purpose of this Handbook

This Handbook is not intended as a contract of employment and so does not constitute a contract. The Handbook is designed to enable employees to become better acquainted with the College and with policies that affect work areas. Naturally, no written statement can be an effective substitute for

direct daily contact with immediate supervisors. However, a thorough familiarity with the contents of this Handbook can be very helpful in many matters that relate to employment at the College. Employees should read all the information carefully, and then keep this Handbook as a ready reference. When questions arise which are not answered herein, employees are encouraged to ask the administrator or department supervisor.

Policy Changes

Great Lakes Christian College reserves the right to change, revise, or delete the plans, policies, benefits, and procedures described in this Handbook at any time the College determines such a change is necessary or desirable to build a better or more secure organization. As changes to the policies outlined in this Handbook become necessary, the College will make such changes through administrative action and then communicated to all employees.

Great Lakes Christian College is . . .

Accredited by the

The Higher Learning Commission www.hlcommission.org

Approved by the

<u>United States Office of Student Financial Assistance</u> for offering federal student aid

Approved by the

State of Michigan Department of Education for offering state financial assistance

Authorized by the

<u>United States Immigration and Customs Enforcement</u> (for enrolling non-immigrant foreign students)

Approved by the

Department of Veterans Affairs www.va.gov

Member of the

Evangelical Council for Financial Accountability

(for compliance with the ECFA standards of financial integrity and Christian ethics

Doctrinal Statement

We believe in the full and final inspiration of the Bible to the extent that it is the infallible Word of God and the all-sufficient rule of life, and therefore, serves as our guide in all matters of faith and doctrine.

We believe the world was created by God, and that He breathed the breath of life into man.

We believe Jesus is the Son of God, fully God and fully man, that He was born of a virgin, died as a sacrifice for our sins, bodily rose from the dead, and is now at the right hand of God the Father.

We believe Jesus Christ is the only way to God and that all who believe Jesus is the Son of God are commanded to repent of their sins, confess Jesus as Lord, and be baptized into Him for the forgiveness of sins and to receive the gift of the indwelling presence of the Holy Spirit.

We believe the Lord's Supper represents the body and blood of Jesus Christ, and that Christians portray His death for our sins as they partake. We also believe the church celebrates the resurrection of Christ as it participates in the Lord's Supper each first day of the week, the day on which He arose.

We believe individual Christians are members of the body of Christ, and, therefore, united with all individuals who belong to that body. We further believe that individual believers as well as the body of believers must seek to be Christ-like both in character and in deeds. We also believe it is the responsibility of Christians to witness for the Lord Jesus Christ, seeking to lead people outside the body of Christ into a saving relationship with God through His only begotten Son, Jesus.

We believe Jesus will return to take all believers to be with Him for eternity and to judge all who do not obey the gospel of the Lord Jesus Christ.

We believe Jesus Christ is the sole head of the church which is His body, and therefore, the church must submit to the authority of Jesus as expressed through the Word of God.

Section B: Personnel Structure

Personnel Groups

This Handbook of policies and procedures is established as an aid in understanding and efficiency for each of the groups of GLCC employees. These groups are identified as:

Executive Administrators

The Executive Administrators includes the President, Vice President of Academic Affairs, Vice President of Enrollment Management, Vice President of Finance and Operations, and Vice President of Institutional Advancement. The President is employed by the Board of Trustees, to whom he reports. Other Executive Administrators are appointed by, report directly to, and are responsible to, the President. They coordinate, supervise, and direct those areas of the College program assigned by the President.

Administrative Staff

The Administrative Staff includes persons filling a salaried position in which the primary duty is planning, organizing, and managing specific departments within the institution. Such positions carry the title of "Dean" or "Director" and require an academic degree and/or specially acquired management skills. Persons filling such responsibilities are classified as "Staff" for benefit and employee group purposes.

<u>Faculty</u>

The Faculty includes persons employed for instructional purposes as well as certain designated Administrative Staff personnel.

Staff

The Staff includes all employees not included in the Executive Administrators, Administrative Staff, or Faculty personnel groups.

Administrative Structure

Board of Trustees

Final authority for the policies of Great Lakes Christian College rests with the Board of Trustees. There is a minimum of fourteen members, with each one serving a four-year term followed by at least a one-year sabbatical. Trustees elected to fill an abbreviated term vacancy may serve up to six consecutive years. The Board of Trustees meets at least three times a year.

The Executive Committee of the Board of Trustees meets as needed to administer the work of the Trustees. The Executive Committee includes the Chairman of the Trustees, the Vice-Chairman of the Trustees, who serves as Chairman of the Executive Committee, the Secretary, the Treasurer of the Board, and the President of the College.

President

The President of the College serves as the Chief Executive Officer. He is subject to the Chairman of the Board of Trustees and has general charge of the business affairs and property of the Corporation and the general supervision over its officers and agents. The President is an ex-officio member of all committees of the College, Board of Trustees and Faculty.

Vice President of Academic Affairs / Academic Dean

The VPAA serves as the Chief Academic Officer. He oversees all academic, curricular, and faculty matters. The Registrar, Director of Library Services, Director of Outreach Ministries, Director of Co-op Programs, Director of Student Success, Director of Online Education, and all Faculty members, regular as well as adjunct, report to him.

Vice President of Enrollment Management

The VPEM serves as the Chief Enrollment Officer. He oversees all admissions, recruiting, and retention areas and employees. He also oversees the athletic department.

Vice President of Finance and Operations

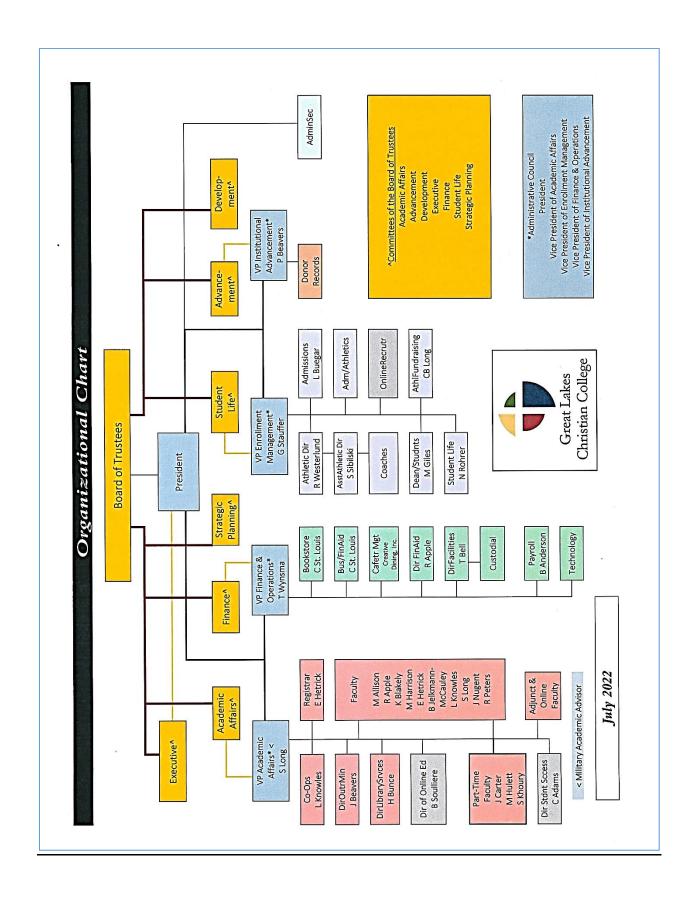
The VPFO serves as the Chief Financial Officer. He oversees the Business Office, Financial Aid Office, Maintenance, Bookstore, and Cafeteria. The manager of each of these areas reports to him.

Vice President of Institutional Advancement

The VPIA oversees the advancement of the College in relation to the raising of funds, the Alumni Association, and the cultivation of friends.

Administrative Council

The Administrative Council is comprised of the President and Vice Presidents of the College.



Section C: Employment Policies

Compensation Policies

Deductions from Pay

Certain deductions will be made from each paycheck.

- The federal and state income tax laws require that an employer withhold income taxes on wages earned. The amount of tax withheld is in accordance with the tax withholding table established by the United States government and the State of Michigan.
- Under provisions of the Federal Insurance Contributions Act (Social Security and Medicare), the employee and the College contribute on an equal basis to provide for retirement and for dependents in the event of the employee's death. The employee's share of this contribution is handled by payroll deduction.
- Other deductions may be made if specifically authorized by the employee. Examples of these deductions are 401(k) pre-tax retirement savings, 401(k) post-tax retirement savings (Roth), elective insurance, and donations to the College.
- Employees may modify their deductions at will by contacting the Business Office.

Holiday Pay and Related Compensation

Time off with compensation is provided for full time employees for the following holidays or the equivalent days:

- New Year's Day (and the day before or after)
- Memorial Day
- Independence Day
- Labor Day
- Thanksgiving Day (and the Friday after)
- Christmas Day (and the day before or after)

To qualify for pay for these holidays and related days, each employee, according to his or her regular work schedule, must work the last full shift before and the first full shift following these days off, unless he or she is excused by the Vice President Finance & Operations, based upon the recommendation of his or her supervisor prior to the holiday dates.

Overtime Pay

On occasion an hourly employee may be asked to work in excess of 40 hours in any week. If this occurs compensatory time off may be given on another day of the same pay period depending upon departmental workload, or the employee will be paid 1½ times their hourly rate for the excess hours. This is at the discretion of the supervisor.

Certain salaried staff jobs will frequently require some assigned evening and/or weekend work and so will be granted some schedule flexibility with compensatory time off, per the approval of one's supervisor.

Payroll Dates

The regular payday is the 5th and 20th of each month. If the 5th or the 20th are a Saturday, payday will be the Friday before. If the 5th or the 20th are a Sunday, payday will be the Monday after. Exceptions to these rules will be communicated to the staff in advance.

All hourly employees shall have their reported time worked approved by their supervisors and turned in to the Business Office at least four days prior to the payroll date.

Employment Policies

Terms of Employment

Great Lakes Christian College is an at-will employer. This at-will employment policy applies to all employees. Employment and any of the terms or conditions of employment may be terminated at any time, with or without cause. The at-will employment relationship may not be modified by any oral or implied agreement by any person, statement, act, series of events, or patterns of conduct.

Personal Conduct

As senior members of the campus community, employees are expected to set the right kind of example in their living, habits, and actions, for students and other adults. Accordingly, personal living is to be within the Christian framework as established by the College's Doctrinal Statement. While some of these expectations are not viewed as absolute standards by all Christians, at Great Lakes Christian College they are observed with the belief that they serve both the good of the individual and of the institution and are in accord with Biblical principles.

Departures from these expectations can result in termination of employment, suspension, or other sanctions at the sole discretion of Great Lakes Christian College. Misconduct including, but not limited to, violations of the Alcohol and Illegal Drug Policy (including tobacco), violation of the Sexual Misconduct Policy, adultery, fornication, homosexual activity, theft, breach of confidentiality, criminal activity, misuse of GLCC property, or any other behavior which may interfere with or degrade the reputation, character, or functioning of GLCC, its staff or the College's Doctrinal Statement as expressed in this Employee Handbook can subject an employee to termination, suspension, or other sanctions. For sanctions short of termination, the scope and nature of such sanction shall be in the discretion of the Vice President of Finance and Operations in concert with the employee's immediate supervisor.

Great Lakes Christian College is a drug-free, smoke-free and alcohol-free campus.

One-on-One Meetings with Others

All College personnel should understand and recognize the risks and potential liabilities of being alone with a student, other employee, or a member of the opposite sex for any length of time in an unobservable or anonymous setting. One-on-one meetings of this kind are neither wise nor permitted. Inappropriate behavior is to be reported to an administrator.

Confidential Information

In the course of normal work employees may have access to confidential information regarding the College, its students, its donors, or perhaps even fellow employees. It is one of the most serious responsibilities that employees in no way reveal or divulge any such information and that they use information only in the performance of their duties.

Conditions of Employment

College employees are selected on the basis of character, ability, experience, training, and a consideration for permanent versus temporary employment. Full-time employees must be at least 18 years of age. The maximum age is governed by the requirements of the job to be filled.

Dress Code

All employees working in the College classrooms or offices where they will often come in contact with the public, are expected to wear attire appropriate for the environment. Supervisors may make allowances in areas such as maintenance, the cafeteria, and wherever else the work calls for alternative dress.

Within these guidelines, supervisors may determine what is appropriate for faculty and staff in their departments.

Employment of Relatives

Relatives of employees may be employed at the College. Such employment will be based upon the standard employment criteria, with no special consideration given because of the family relationship. Employees will not be permitted to hold a position in which they work for or report directly to a relative.

Family Members and the Workplace

Employees are reminded that for other than a rare special occasion or campus event scheduled for public attendance, family members should not visit employees on campus during their scheduled working hours.

Nondiscrimination Policy

Because of our commitment to the Biblical principle ("There is neither Jew nor Greek, slave or freemen, neither male nor female..." Galatians 3:28), Great Lakes Christian College has been, and remains, nondiscriminatory in all policies and programs. Great Lakes Christian College admits students of any race, color, and national, or ethnic origin to all rights, privileges, programs, and activities generally made available to students at the College. It does not discriminate on the basis of gender, race, physical handicap, national or ethnic origin in

administration of educational programs, admissions policies, scholarship and loan programs, employment practices, athletics, or other activities. The College actively seeks to fulfill federal, state, and local laws and regulations in all its practices and facilities. The facilities are designed to provide access for the physically handicapped.

Personnel Records

For various reasons it is important that the personnel records contain accurate and up-to-date personal information about each employee. Any change in an employee's marital status or the number of children or other dependents in the immediate family should be reported promptly to the Business Office. This information may have a direct bearing on the amount of payroll deduction for State and Federal Withholding Tax and on the amount of insurance premiums and benefits (if any). Any change in telephone numbers or addresses should also be reported to the Administrative Secretary.

<u>Unemployment Compensation</u>

The College participates in the State of Michigan program that provides temporary financial assistance to the unemployed until they secure new employment.

Weather

It is the employee's responsibility to report to work whenever the College is open for a normal working day. If there is a question about the College being open, please call the main line (517-321-0242) after 7:00 a.m. and listen for the recording. If the College is closed the greeting will announce that fact.

Workers' Compensation Insurance

Employees are covered by Workers' Compensation Insurance, insurance carried on the employee's behalf for injuries arising out of or occurring in the course of employment with the College.

This insurance will pay a weekly income at a rate determined by law after the first seven days of disability. It provides medical attention and hospital services; and in the event of permanent disability or death, it will pay certain sums to the injured employee or to the family of the deceased. Any injury arising out of and in the course of employment must be reported immediately to the employee's supervisor. Claim forms are to be completed at the Business Office within 24 hours of the injury by the employee or someone representing him or her.

Section C 2: Employee Benefits

Plan Administrator

Under the provisions of the Employee Retirement Income Security Act of 1974 (ERISA) the Vice President of Finance and Operations has been designated the "Plan Administrator" with the authority to control and manage the operation and administration of all employee benefit programs at Great Lakes Christian College.

Insurance

The insurance coverage is briefly outlined below, however additional information providing much greater detail is available from the Business Office. ("Full time" for insurance purposes is 30 hours or more per week.) Coverage of an employee already covered under the 30-hour minimum provision may be considered for continuation upon a reduction in work schedule if yet employed 20 hours or more per week and if this is permitted under insurance carrier policy.

- <u>Health Insurance</u>: College-provided health insurance has been suspended indefinitely in lieu of a stipend paid to full-time employees. The intended purpose of the stipend is to help enable employees to purchase their own health insurance policy. This practice will be evaluated on a regular basis for its value to employees.
- <u>Life Insurance</u>: Full time employees are provided life insurance coverage in the amount of twice their annual earnings, rounded up, to \$100,000 of insurance coverage. Coverage is currently through Unum Life Insurance Company of America (www.unum.com). The Business Office has information about the plan as does Unum's website.
- Long Term Disability Insurance: Full-time employees are provided financial protection in the event of a long-term disability. This protection amounts to 60% of one's monthly pay up to a maximum of \$3,500 per month. Coverage is through Unum Life Insurance Company of America (www.unum.com). The Business Office has information about the plan as does Unum's website.
- <u>Termination of Insurance</u>: In case of termination of employment, insurances will be affected as follows:
 - All health (if provided), life, disability and long-term care insurances will continue in force until the end of the month in which the last deduction and/or contribution is made toward these insurances; continued coverage may be purchased as provided by law.
 - o The long-term disability, long term care, and life insurance coverage ceases on the last day of the month of termination.
 - O Terminating employees and their family members who are covered by the College's health insurance (if any) may be entitled to continue their coverage if their termination of employment constitutes a Qualifying Event as defined by the Consolidation

Omnibus Budget Reconciliation Act (COBRA). The employee will be notified of their COBRA Rights, the cost of continuing coverage, and the duration of coverage.

Retirement Program

Full time employees have the opportunity to participate in a 401(k) Retirement Savings Plan through the Principal Financial Group. There is currently no employer match of contributions. The Business Office can provide more information about one's options. Eligible employees are encouraged to regularly set aside funds for retirement.

Tuition

Full time faculty, staff, and administrators of the College, along with their spouses and dependent children, are eligible to receive Full-Time Employees Tuition Grant for GLCC classes taken at the College. Recipients must first apply for federal financial aid. Federal and state grant money will be applied before this Grant, but the net result is that the recipient will not bear any of the cost of tuition. Course fees, books, materials, private music instruction fees, and independent study fees are not included.

A Full Time Employees Tuition Grant is also available to part-time employees (excepting student employees) as follows:

After 2,000 hours of employment	50% tuition
After 4,000 hours of employment	100% tuition

If any full-time faculty, staff, or administrator becomes totally disabled, dies, or retires during the time he or she is employed by Great Lakes Christian College, this benefit will be extended to the spouse and dependent children as follows:

Years of Employment	Benefit Rate
0 - 5	0%
6 - 10	50%
11 +	100%

Chapel Attendance

As an aid to communication and strengthening the ties of the College family, employees have the privilege of attending Chapel during the College year. Such attendance is to be scheduled with one's supervisor so that normally no department will be left without a least one employee on duty during such time and due care is given to urgent service needs.

Jury Duty

Employees who are called to serve on jury duty will receive their regular compensation for the actual service time. Pay received by the employee for this service, except for travel expense reimbursement, is to be given to the College. The employee is expected to return to their College duties when excused from attendance at court, when reasonable.

Leave for Death in the Immediate Family

In the event of a death in the immediate family of an employee, the College grants from one to three days of paid leave time, as needed for extended travel time or special responsibility. Immediate family includes in-laws, grandparents, spouse, children, parents, sisters, and brothers.

Military Service

For military service of more than thirty days, the employee will be placed on Military Leave of Absence, and reinstated with full benefits upon return to active employment, subject to employment openings for which the employee is qualified; otherwise, to be put on the preferred waiting list for the first vacancy.

Personal Leave

A Personal Leave of Absence may be requested for the following reasons:

- <u>Education</u> Granted for a maximum of six months. Extensions may be granted, subject to supervisor approval. The education must directly relate to the employee's job.
- <u>Family Care</u> Granted for a maximum of ninety days, for the purpose of providing care for immediate family members who are suffering from a catastrophic injury, disability or illness. The employee must return to work for six months before becoming eligible for another leave.
- <u>Non-Disability Maternity</u> Granted for a maximum of ninety days during pregnancy and may extend into post-pregnancy.

Personal Leave must be requested in writing to the employee's supervising Vice President and is available only to those with one or more years of continuous service. All personal leave will be without pay and will become effective after all vacation time has been used.

The College will continue to make contributions to the employee's benefit package at the level in effect on the last day worked.

No holiday pay is available for an individual on Personal Leave. If Personal Leave extends from one fiscal year to the next, the individual will not be entitled to vacation time for the new contract year until after a return to work of at least fourteen calendar days. An individual on approved Personal Leave will have his or her continuous service preserved for vacation eligibility. Sick leave will not accumulate while on personal leave.

Purchases

Personal purchases through the College are not permitted except in instances when an employee's discount can be received directly by the employee through the vendor. Personal

purchases may be made through the College only when it is for the convenience of the vendor and when financial arrangements have been made for payment of the account.

Sick Leave

Salaried employees will accumulate sick leave at the rate of ½ day per month for each full month of employment. For part time employees, sick leave will be considered in conjunction with the hours worked per week. An employee may accumulate up to a maximum of twenty days. Accumulated sick leave is not chargeable to the College for additional wages.

Sick leave is only to be used for personal illness. When ill, the employee must notify his or her supervisor as soon as feasible. Any time lost because of an accident or injury on the job is covered by Workers' Compensation Insurance and is not chargeable against sick leave.

In the event an employee's absence continues beyond eight consecutive days, the employee may be eligible for benefits under the College's disability insurance program. The employee must use any eligible time (vacation, personal, and sick days) to cover this period.

After the eighth consecutive day of absence due to illness, the employee shall file the proper disability forms with the Business Office. In certain cases of disability, the employee may be eligible to be paid up to a maximum of three months. Extensions of this time are granted at the discretion of the President.

Requests for sick leave are to be made by the employee through their supervisor.

Speaking Engagements

Employees may be asked from time to time participate in church or area activities. If the primary purpose of such an engagement is to represent the College, expenses and an honorarium will be paid according to the schedule provided, and any reimbursement received must be turned in to the College. For employees whose primary job is representing the College, no honorarium will be paid for speaking on behalf of the College, for preaching, or for any other activities at that appearance.

Remuneration for all speaking engagements, supply preaching, or music performance when the primary purpose is not representing the College is between the congregation or organization and the employee.

Vacation

Full-time staff members receive vacation as an earned benefit; therefore, the required time must be completed before the time off is available. All vacations must be taken at a time approved by the department supervisor or administrator. The length of earned vacation is determined as follows:

<u>Length of Employment</u> <u>Vacation Time</u>
After 6 months 2½ working days

After 1 year 5 working days
Beginning 2nd year through 5th year 10 working days
Beginning 6th year through 10th year 15 working days
Beginning 11th year and succeeding 20 working days

All vacation time must be used prior to the beginning of the next fiscal year (July 1). Vacation credit may not be accumulated and/or carried over from one year to the next, except when approved by one's supervisor.

Vacations must be requested two weeks prior to their beginning. Supervisors and administrators reserve the right to refuse vacations at certain times and to assign vacation times if necessary.

Section D: Employee Services

Bookstore Purchases

Items may be purchased from the Bookstore, either from stock or by special order at a 20% discount. Special orders made with the College as the purchasing agent may be made only through the Bookstore.

Borrowing Equipment & Custom Work Policy

College equipment, supplies, and personnel are purchased or employed specifically for College purposes. Equipment capacity and employee hours are established to meet College needs and employee schedules.

Duplicating services and other similar processes shall normally not be provided for other than specific College needs. Exceptions may be:

- Occasional assistance may be provided for local service-oriented groups such as Kiwanis, firemen, etc. Large or frequent jobs should be done elsewhere.
- College employees may purchase such service if there is flexibility for working the job around scheduled College jobs.
- Usage of College-owned equipment shall ordinarily be limited to official College needs.
 Occasional exceptions may be made for College personnel if advance arrangements are
 made with the department responsible for the equipment, scheduled around official needs,
 equipment is properly signed out and returned, and with the understanding the user is
 responsible for any damages which result from the usage. Items of specific concern are
 maintenance equipment and audio-visual equipment such as projectors, recorders, sound
 equipment, etc.
- Students and non-employees should not be allowed to use office phones or College equipment. Computers are available in designated College facilities for student use.

Check/Cash Requests

If an employee is making a College-sponsored trip or other authorized expenditure requiring the drawing of an advance, the request should be made at the Business Office at least 48 hours in advance. Expense reports must be filed, and the advance cleared as soon as possible on return from the trip.

College Computers

All employees are responsible for following the College policy on computer usage. (See Responsible Use of GLCC System Resources.)

Key Usage Guidelines

- Great care of keys is essential to College safety, security, and preservation of assets. Employees should guard College-issued keys securely.
- The issuing of duplicate keys will be authorized by the Vice President of Finance and Operations. No other employee is authorized to do so.
- Keys must never be left on a desk, chair, shelf, etc. Keys should be kept in a pocket, on a ring attached to apparel, in a purse, or other secure place under immediate control.
- Keys should never be loaned to students. For legitimate requests an employee may unlock a facility for another person instead of loaning the key.
- The loss of any key should be reported immediately to the Facilities Supervisor.
- When an employee's assignment no longer requires the use of certain issued keys or employment is discontinued with the College, those keys issued to him shall be immediately collected by the employee's supervisor.
- All College keys must be turned in at the designated place before the employee's final paycheck is issued.
- Employees are not to turn keys over to a successor.
- Part time faculty members must turn in their keys at the conclusion of their teaching responsibilities.
- A replacement charge of \$125 will be made for each key lost.

Mail

Intercampus mail is distributed every workday with each employee having a mailbox or other designated place to receive campus communications.

GLCC mailroom and delivery facilities are intended for the handling of College mail. Accordingly, all personal mail should be sent to the employee's home or own post office box in the local public post office. College stationery and postage are to be used only for official College correspondence.

Notary Services

Notary services are available to College employees without cost.

Safety

Employees are expected to comply with College safety rules and regulations. Where appropriate, supervisors will inform employees of special safety guidelines. If an on-the-job injury occurs, or an unsafe condition exists, it should immediately be reported to the supervisor for appropriate action. General questions regarding safety should be referred to the Vice President of Finance and Operations.

In case of workplace injury employees should

- 1. <u>Notify</u> their immediate supervisor if the injury allows them to do so. A co-worker or other party with knowledge of the incident may notify the supervisor if the worker cannot.
- 2. <u>Seek</u> medical treatment (hospital, urgent care facility, doctor) if necessary. Please make the provider aware that it is a work-related injury.
- 3. <u>Call</u> (or have someone else call) the Administrative Secretary (cell 517-230-0720) as soon as feasible to report the name of the injured employee, the injury, and where the employee is going for medical treatment;
- 4. When the injured worker is able he or she must complete an Injury Report available from the office of the Vice President of Finance and Operations or from the Administrative Secretary.

Security

Campus security can only be realized through cooperative efforts. Staff members having the last work of the day in a given room or area are responsible to turn off the lights and be sure the windows and doors are locked. Anytime personnel gain access to or are present in College facilities after hours or during the weekend they should be certain that any doors used are left locked and latched.

Transportation Services

The demands upon College vehicles are frequent and require cooperation and care by all employees to best meet the needs of the College. Guidelines are as follows:

- College vehicles are primarily for College group travel. They are not for individuals to use as "company cars." Employees using personal vehicles to fulfill assigned work responsibilities will be reimbursed at the current IRS standard mileage rate.
- Requests for use of vehicles must be made to the Administrative Secretary as soon as the need is known (preferably two weeks in advance). Provisions for vehicle use will consider the order in which requests are received, the size and nature of the group, and the distance traveled. Maintenance of vehicles and their use are under the authority of the Vice President of Finance and Operations.
- Employees in possession of a College vehicle are to use it for College business only. Unauthorized use of vehicles has serious implications for legal and insurance considerations. Employees using College vehicles are reminded that under federal tax law personal use of College vehicles is a taxable benefit and must be reported as such.
- GLCC employees must complete an Employee Application for Qualified Driver Status and submit it with a copy of the front and back of their driver's license to the Administrative Secretary (office 123) at least three weeks before first driving a College vehicle. Potential drivers of College vehicles will be required (1) to allow the College to verify their driving record with the state issuing the license, and (2) be at least 21 years of age.

Section E: Employment Practices

Changes of Status: Permanent, Temporary, Full Time

When a part-time or temporary employee moves to full time or permanent employee classification, the employee's prior service for determining fringe benefits participation eligibility shall be equated on the following basis:

- For each fiscal year the subject employee served 2,000 or more hours, the employee shall be credited with a full year of service.
- For each fiscal year the employee has accumulated 1,000 hours but less than 2,000 hours, the employee shall be credited with ½ year of service. (Years of less than 1,000 hours service shall not count for this determination.)
- When a permanent employee enrolls at GLCC for seven or more semester hours of credit in a given semester, the employee's status will be considered to have become that of a student or temporary employee, with references to fringe benefits participation. (The intent is to limit the full-time employee's academic load to ½ time. This is also true for Internships.) Exceptions to benefits participation may be made for employees having been employed at the College full time for at least three years and continuing employment at the College for at least 20 hours per week, while participating in a required full-time block academic load such as Internships. Such employees may participate in all benefits programs at ½ cost to which their full-time employment would entitle them for not more than one semester.

Hiring Procedures

The immediate supervisor or administrator normally handles the hiring of designated personnel, with normal approvals. Applicants must complete the application forms provided by the College.

A pre-employment criminal background check will be conducted for all persons the College wishes to hire for a faculty or support staff position. This policy does not apply to temporary student-worker positions.

Layoff and Recall Policies

If GLCC determines that it must reduce employment because of adverse economic or other conditions, then layoffs and recall from layoffs will generally be conducted in accordance with the procedures described below.

Regarding layoffs:

- 1. In the event that a layoff is expected, GLCC will attempt to communicate information about an impending layoff as soon as possible. However, management reserves the right to alter the layoff procedure and withhold information about the layoff as permitted by law to protect the College's interests.
- 2. Employees will be selected for layoff based on the following criteria:

- Non-transferability of skills to other positions within the College.
- Demonstrated current and past performance.
- The needs of the College.
- Length of service with the College.
- 3. Employees selected for layoff will be given at least two weeks' notice, or as much as is reasonable under the circumstances.
- 4. If the layoff is expected to exceed thirty days, vacation pay equal to the number of unused vacation days accrued will be paid at the time of layoff. Employees who are laid off will not accrue vacation or sick leave during the layoff.

Regarding recalls:

Employees will be recalled according to the needs of GLCC, their skills, and their ability to perform the job. Notice of recall will be sent by registered mail, return receipt requested, to the current home address on record with the Business Office. Unless an employee responds to the recall notice within seven days following receipt of the notice or its attempted delivery, the employee's name will be removed from the recall list and the employee will no longer have any job rights with GLCC.

Promotional Considerations

Promotions to higher paying positions are on the basis of qualifications and the recommendations of the employee's supervisor and concurrence by the appropriate administrator. Consideration is given to seniority, but the controlling factors are past performance, creative ability, training, experience, cooperation, and initiative. Whenever possible, the College promotes from within the organization although it must, on occasion, employ others with diversified experience. Questions like these may be used in determining employees best qualified for promotion:

- How well does the employee perform current duties?
- Does the employee do his or her share willingly?
- Is the employee a self-starter?
- Does the employee have ideas and suggestions?
- Do fellow workers respect this employee?

Termination of Employment

<u>Resignation</u> – The College hopes an employee's association with the College will be long. However, an employee may be released from his or her employment at the employee's request with two weeks written notice to the employee's supervisor or Vice President of Finance and Operations. Failure of an employee to give notice may result in loss of any accumulated benefits.

If an employee chooses to leave the College, his or her supervisor should be notified as soon as possible. Advance notice helps in preparation and prompt payment of the final pay. It also

permits the College to give the employee complete information about available insurance benefits.

Pay for employees terminating will be available on the next regularly scheduled payday.

Employees in good standing are given consideration if they wish to return to work at a later date.

<u>Administrative Decision</u> – If economic or program revisions make it essential for the College to terminate or revise the number of employees, this may be done with not less than two weeks written notice to the affected employees.

<u>Unsatisfactory Performance</u> – If an employee's performance is unsatisfactory due to lack of ability or failure to fulfill the requirements of the job, the employee will be notified of the problem and their supervisor will work with them to correct the situation. Failure to correct the situation may result in suspension or termination. If the employee's failure is due to a mismatching of person and job, every effort will be made to find a more suitable position. Failure to find a more suitable position may result in suspension or termination. In cases of misconduct, disciplinary actions or sanctions may be imposed including termination, suspension, or other sanctions.

Section F: Computer Usage and Support Policy

RESPONSIBLE USE of GLCC SYSTEM RESOURCES

College Computing

Introduction

Policy Definitions

- 1. GLCC Systems the entirety of all computing and information assets of Great Lakes Christian College and/or any subcomponents thereof. This includes College issued cell phones, laptops, other computer equipment and campus provided Internet.
- 2. Great Lakes Christian College—aka GLCC—refers to the organization as a whole and/or any sub-entity thereof.
- 3. Information Assets any and/or the totality of all data and information under Great Lakes Christian College control and for which Great Lakes Christian College is responsible to protect.
- 4. Technology Assets any and/or the totality of all equipment and/or operating software used to input, manipulate, process, transmit, and/or display information assets that are owned, leased, or operated by any client of Great Lakes Christian College.
- 5. Client Anyone who uses any information and/or technology asset of Great Lakes Christian College, including, but not limited to, students, employees, contractors, consultants, temporaries, volunteers, and other workers at Great Lakes Christian College, including all personnel affiliated with third parties as they conduct business with GLCC.
- 6. Google Apps for Education an integrated communications and collaborations system that is hosted by Google, Inc. and provides enterprise level email, calendaring, and other various interconnected services to all levels of educations.

Overview

Great Lakes Christian College provides students and employees with access to network, computing, and other technological resources as an integral part of the educational and work environment. Those using these resources should do so responsibly in a manner consistent with the GLCC mission and objectives. As a private network, GLCC reserves the right to define and enforce appropriate regulations to ensure that the use of these resources is consistent with its mission. This policy serves to explain the expectations of responsible use, the norms for GLCC System monitoring and administration, and the enforcement mechanisms to ensure compliance.

GLCC desires to protect its students, employees, and partners from illegal or damaging actions by individuals, either knowingly or unknowingly. The purpose of this policy is to assist in maintaining a safe and secure computing environment for all authorized end users of the Great Lakes Christian College network resources. This document is meant to ensure that the GLCC System remains available and reliable, and is used for purposes appropriate to GLCC's mission.

Effective information security and responsible use is a community effort involving the participation and support of every Great Lakes Christian College student, employee, and other affiliates who interact with information and/or Information Technology. It is the responsibility of all Great Lakes Christian College constituents to know this policy and to conduct their activities accordingly.

<u>Scope</u>

This policy applies to all equipment and communication facilities that are owned or leased by Great Lakes Christian College and/or are connected to the network of Great Lakes Christian College. This policy applies to all students, employees, contractors, consultants, temporaries, volunteers, and other workers at Great Lakes Christian College, including all personnel affiliated with third parties as they conduct business with GLCC. Unless otherwise designated, all policy statements apply to all clients (end users) of GLCC System resources at all times.

<u>Authority</u>

This policy has been reviewed by College administration and is adopted per its approval.

Basic Principles

The use of GLCC System resources is for the education and administrative functions necessary to conduct the mission and business of Great Lakes Christian College. Ethical standards which apply to other College activities (e.g. the Employee or Student Handbook, contractual obligations, and all local, state and federal regulations and laws) apply equally to the use of GLCC System resources. As in all aspects of College life, GLCC System clients should act honorable and in a manner consistent with commonly accepted ethical obligations. Stealing, deception, vandalism, harassment, and other unacceptable actions or behaviors are just as wrong in the context of the GLCC System as they are in all other domains of the College and life.

As stewards of the technology and information entrusted to the College, the following principles are to be upheld:

- Respect one another's need for access to GLCC Systems and act in a manner that allows all clients to flourish in the use of these resources.
- Do not waste GLCC System resources.
- Do not destroy GLCC System resources either through neglect or purposeful acts.
- Communicate with respect and integrity.
- Respect others' tangible and intellectual property.
- Respect others' privacy.

Use of GLCC Systems is restricted to authorized clients. For the purpose of this policy, an authorized client is an individual who has been granted specific access privileges by an authorized agent. Access privileges are controlled via login ID's and authentication mechanisms (e.g., passwords). Individual clients are responsible and accountable for the proper use of their access privileges, including protection of their login IDs and passwords.

Clients are responsible for reporting any activities that they believe to be in violation of this policy to the Director of Technology.

General Use and Ownership

- 1. Passwords, codes, and the contents stored on any GLCC System asset, including, but not limited to, *Google Apps for Education*, network, computer, removable media, telephone, and voicemail systems are the property of Great Lakes Christian College (except where amended by the Employee Handbook).
- 2. Great Lakes Christian College-provided computing devices (e.g., PCs, laptops, smartphones, tablets, etc.) are owned by Great Lakes Christian College, and are only to be used by the person who signed for the device. The person to whom the device is assigned is responsible for the condition of the device. The computing device is provided to ensure the employee and/or student has the tools necessary to complete their work, and it is not provided to be the "family computer."
- 3. Great Lakes Christian College allows for the use of personal devices for work purposes relating to non-confidential data. Privacy protected data must only be used or accessed on a Great Lakes Christian College issued device. Great Lakes Christian College data is not to be stored on a personal device. The only authorized "Cloud Storage" service allowed is Great Lakes Christian College's Google Drive. The Google Drive app is not to be installed for use with Great Lakes Christian College accounts on personal computers.
- 4. While Great Lakes Christian College desires to provide a reasonable level of privacy, clients should be aware that the data they create on GLCC System devices remains the property of Great Lakes Christian College. Intellectual Property as protected by the Employee Handbook or by contract with Great Lakes Christian College is exempted. Because of the need to protect and monitor GLCC Systems, a guarantee of confidentiality of information stored on any technology asset cannot be made.
- 5. Clients are responsible for exercising good judgment in the personal use of GLCC System assets.
- 6. Final determination of responsible use and of usage not covered by this policy by any client of any GLCC system resource lies solely with the College administration.
- 7. For security, compliance, and network maintenance purposes, Great Lakes Christian College reserves the right to monitor equipment, systems, network traffic, and data without prior notification.
- 8. Great Lakes Christian College reserves the right to audit networks, systems, and data to ensure compliance with this policy, to address technical problems, and in response to official investigations.

Security and Proprietary Information

1. Reasonable steps should be taken to ensure the security of confidential information. Examples of confidential information categories include, but are not limited to, private College communiqué, College strategies, competitor-sensitive data, trade secrets, specifications, customer lists, and research data. Clients should take all necessary steps to prevent unauthorized access to this information.

- 2. User IDs are never to be shared with anyone outside of Great Lakes Christian College and passwords are to be kept secure and never be shared with anyone. Authorized end users are responsible for the security of their passwords and accounts.
 - a. All passwords will be changed every 180 days.
 - b. Passwords require a minimum of 8 characters.
- 3. Never leave a logged in device unattended. If this is necessary, devices are to be secured with a password-protected screensaver with the automatic activation feature set at 10 minutes or less, or by logging-off or locking the computer when unattended. This applies to any device (a GLCC System or personal) when a GLCC Login ID is in use.
- 4. HIPAA or FERPA-mandated confidential information shall not be transmitted or stored in *Google Apps for Education*, or on PCs, laptops, or portable storage devices, DVDs, CDs, floppy disks, or any other easily portable storage medium. It must be maintained on officially sanctioned and supported systems designed for storing and managing this data. More detailed information regarding protected information:
 - a. Family Educational Rights and Privacy Act (FERPA) Data
 - i. The Family Education Rights and Privacy Act (FERPA) is a federal law that protects the privacy of student education records. Student records protected by FERPA are not permitted in the Great Lakes Google Apps services. Student records should never be made publicly accessible.
 - b. Health Insurance Portability Accountability Act (HIPAA) and Protected Health Information (PHI) Data
 - i. Email, by its nature, is not a secure medium for sharing sensitive information, and Google Apps should not be used to store or transmit protected health information (PHI). Individually-identifiable health information is legally protected by Federal HIPAA Privacy and Security laws as well as Michigan state regulations.
 - ii. Protected health information should remain in a record system designed to contain health information and should be de-identified (stripped of all 18 HIPAA identifiers) before being shared electronically. If de-identifying the information is not possible, appropriate methods for securely transmitting the information include:
 - 1. Use of integrated encrypted messaging system associated with a legally certified electronic health record system.
 - 2. Directory file sharing within a professionally managed and supported networked environment such as the College's "Active Directory" service, which provides access only to those whose job requires it.
 - iii. Additional obligations to remember when sharing PHI:
 - 1. Limit the amount of information to the minimum that is required.
 - Misdirected information or incidents involving the inappropriate use
 of protected health information must be reported immediately.
 Misdirected health information must be included in all accounting of
 disclosures.
 - 3. Ensure that the recipient of the information is legally authorized to receive the information.

- c. Social Security Numbers, Driver's License Numbers, Financial Account Information, and Credit Card Numbers
 - i. GLCC Google Apps should not be used to store, maintain, transmit, or email Social Security numbers, driver's license numbers, financial account information, or credit card numbers. Such data should be stored only on systems approved for such use.
- 5. In the event of a suspected security breach or a known security breach, the Director of Technology must be notified. This is to facilitate compliance with state law and ensure prompt emergency response to a potentially critical situation.
- 6. Online posting of content of any kind (e.g., blog, user forums, comments, video, etc.) are not to be posted with Great Lakes Christian College credentials (e.g., user@glcc.edu), unless being done as official Great Lakes Christian College correspondence. The Vice President of Institutional Advancement is authorized to approve all exceptions to this rule.
- 7. All GLCC-provided assets are required to run anti-virus/malware software, and be kept up to date. GLCC-provided devices will have this software and all recent updates installed by default. End users may not disable or uninstall this software.
- 8. Email attachments received from unknown or untrusted sources should be deleted without opening.
- 9. Caution should be exercised when responding to emails appearing to come from official sources. Phishing attempts have increased dramatically in recent years. GLCC's staff will not request your password, or any other confidential information, through email, so any such request should be denied as fraudulent.

Google Apps for Education

Google Apps for Education includes, but is not limited to: Gmail, Calendar, Docs, Drive, and Google+. Great Lakes Christian College retains the right to activate or deactivate any of the individual services provided under Google Apps for Education.

Adherence to Google Policies

- 1. Anyone in the Great Lakes Christian College community utilizing *Google Apps for Education* must agree and adhere to the general Google Apps Acceptable Use Policy found here: http://www.google.com/apps/intl/en/terms/use_policy.html.
- 2. Anyone in the Great Lakes Christian College community utilizing *Google Apps for Education* must acknowledge and comply with the *Google Apps for Education* terms of service found here:
 - http://www.google.com/apps/intl/en/terms/education_terms.html.
- 3. Failure to comply may result in the termination of your *Google Apps for Education* account.

Data Management and Support

- 1. HIPAA or FERPA mandated confidential information must not be stored or emailed through *Google Apps for Education*, as stated in this document under *Security and Proprietary Information*, item 4).
- 2. Data stored in *Google Apps for Education* (documents, photos, forum posts, etc.) belong to Great Lakes as though they were stored on a networked server or GLCC-maintained

hardware as described in this document.

- a. Faculty and Staff are not to store personal data in their GLCC *Google Apps for Education* account (except where allowed by the Employee handbook).
- b. Students are allowed to store their personal data in *Google Apps for Education*. However, students are responsible for managing their own data.
- 3. WARNING: Any Google content (eBooks, music, games, etc.) purchased with your Great Lakes *Google Apps for Education* account is not transferrable.
- 4. If there is a system-wide service disruption or outage, IT will be the interface with Google for communication and support.

GLCC's Information Technology department provides only limited support of Gmail and Calendar synchronization with Outlook for Windows and Mail and Calendar for Mac. Google's online help supports all other services and features.

Unacceptable Use

The following activities are prohibited while using any GLCC Systems unless expressly exempted for these restrictions during the course of legitimate job responsibilities, in which case systems administration staff may need to disable the network access of a host if that host is disrupting production services. Any behavior that is in violation of this policy, the Employee Handbook, or the Student Handbook is considered unacceptable use. The lists below, while not exhaustive, provide a framework for activities that are considered unacceptable use. Final determination of acceptable and unacceptable use lies within the authority of the Vice President of Finance and Operations.

System and Network Activities

- 1. Utilizing a GLCC System asset authorized to engage in activity that is illegal under local, state, federal, or international law.
- 2. Use of personal or private networking equipment, except where approved by the Director of Technology. This includes wireless routers, network hubs, network switches, and routers. Requests for approval should be submitted to the Director of Technology.
- 3. Violations of the rights of any person or company protected by copyright, trade secret, patent, or other intellectual property, or similar laws or regulations, including, but not limited to, the installation, distribution, or sharing of "pirated" or other software products that are not appropriately licensed for use by Great Lakes Christian College.
- 4. Unauthorized copying of copyrighted material including, but not limited to, digitization and distribution of photographs from magazines, books, or other copyrighted sources, copyrighted music, and the installation of any copyrighted software for which Great Lakes Christian College or the client does not have an active license.
- 5. Exporting software, technical information, encryption software, or technology, in violation of international or regional export control laws. The Director of Technology should be consulted prior to export of any material that is in question.
- 6. Willful introduction of malicious programs into the GLCC Network (e.g., viruses, Worms, spyware, malware, etc.) or any other network or server.
- 7. Revealing any GLCC System account and/or password to others or allowing the use of your account by others. This includes, but is not limited, to family, friends, and co-workers.

- 8. Using a GLCC System asset to actively engage in procuring or transmitting material that is in violation of sexual harassment or hostile workplace laws.
- 9. Using a GLCC System asset to create and/or distribute defamatory or threatening communications.
- 10. Using a GLCC System asset to access, create, or distribute any obscene, sexually explicit, or pornographic materials.
- 11. Making fraudulent offers of products, items, or services originating from any GLCC System asset.
- 12. Making statements about warranty, expressly stated or implied, unless it is a part of one's normal job duties.
- 13. Effecting security breaches or disruptions of network communication. Security breaches include, but are not limited to, accessing data of which the client is not an intended recipient or logging into a GLCC System asset that the client is not expressly authorized to access, unless these duties are within the scope of regular duties. For purposes of this section, "disruption" includes, but is not limited to, network sniffing, ping floods, packet spoofing, denial of service attacks, and forged routing information for malicious purposes.
- 14. Port scanning or security scanning.
- 15. Executing any form of network monitoring which will intercept data not intended for the client's host, unless this activity is part of an employee's normal job/duty.
- 16. Circumventing user authentication or security of any GLCC System asset.
- 17. Using E-mail to attempt, through social engineering, to fraudulently misrepresent oneself in an effort to acquire protected information (phishing).
- 18. Using any program/script/command or sending messages of any kind with the intent to interfere with or disable a client's session, via any means, locally or via the network.
- 19. Intentionally creating, modifying, reading, accessing, or copying data to or from any areas to which the client has not been granted access. This includes accessing, copying, or modifying the files of others without their explicit permission unless done as part of system administration by authorized employees.
- 20. The establishment of any function that provides unauthorized access, via the Internet connection or otherwise, to any GLCC System asset without the express written permission of the Director of Technology. This includes peer-to-peer applications that bypass normal network authentication protocols.
- 21. The use of any GLCC System asset to gain unauthorized access to any Great Lakes system or off-campus computer system.
- 22. The use of GLCC System assets for commercial purposes (e.g., running a personal or private business, conducting business for another employer).

Email and Communication Activities

- 1. Sending unsolicited email messages, including the sending of "junk mail" or other advertising material to individuals who did not specifically request such material (e.g., email spam). Official communiqués of the College do not constitute unsolicited email.
- 2. Any form of harassment via email, telephone, or paging, whether through language, frequency, or size of messages.
- 3. Unauthorized use, or forging, of email header information.

- 4. Solicitation of email for any other email address, other than that of the poster's account, with the intent to harass or to collect replies.
- 5. Creating or forwarding chain letters, "Ponzi" schemes, or other "pyramid" schemes of any type.
- 6. Use of unsolicited email originating from within Great Lakes Christian College's network or other network service providers on behalf of, or to advertise, any service hosted by Great Lakes Christian College or connected via Great Lakes Christian College's network.

Monitoring

This statement serves notice to GLCC System clients that the GLCC System is considered a private network of Great Lakes Christian College and that regular monitoring of system activities does occur. Only those persons who are expressly authorized by the Director of Technology may engage in system monitoring.

The following are likely to be monitored on a regular basis.

- System log files that contain information pertaining to processes executed on a GLCC System asset.
- System directories.
- Temporary and permanent storage areas.
- System security logs.
- GLCC System assets associated with reported incidents of harassment or other violations of this policy.
- Any GLCC System asset that must be monitored to comply with local, state, and/or federal law and/or court orders.
- Any activity that appears to compromise the security or integrity of the GLCC System.
- Web site access logs.

Privacy

All clients, including the staff of Information Technology, should respect the privacy of other authorized clients. This includes respecting the rights of others' security of files, confidentiality of data, and ownership of their work as prescribed by other College policies.

In order to enforce the policies set herein and to maintain the functionality and integrity of GLCC Systems, the Information Technology staff is permitted to monitor activity on any GLCC Systems system in accordance with guidelines established by the Director of Information Technology. Audits of GLCC Systems assets (applications, networks systems, servers, and PCs) for potential violations of these policies can be initiated at any time. When there is clear evidence of a violation, the College's Information Technology staff may view clients' GLCC Systems files, monitor keystrokes, and otherwise monitor clients' activities. In cases deemed especially serious by the appropriate authorities, Information Technology staff may read clients' GLCC Systems email.

If a member of the College community besides the Information Technology staff reports activities in apparent violation of College policy, he or she should notify the Director of Information Technology who will then contact other College authorities as necessary. Upon authorization of an

investigation into a client's use of GLCC Systems, Information Technology staff, at the direction of the Director of Technology, may initiate activities and review data. All such investigations shall be kept on-file by the Director of Technology and shall be considered confidential with access only by authorized agents of the College. In the course of an investigation, evidence of violations of law will be referred to the appropriate law enforcement officials.

Great Lakes Christian College is under no obligation to inform any client of system monitoring or access to client information in the course of an investigation.

Enforcement

Violation of this policy may result in disciplinary action by the College's administration up to and including dismissal. Violation of State or Federal statutes may result in civil or criminal proceedings as well.

System administrators, with due regard for the privacy of clients and the confidentiality of their data, have the authority to suspend or modify GLCC System access privileges and examine files, data, and any other materials that may aid in maintaining the integrity and efficient operation of the system. Clients whose activity is viewed as a threat to the operation of a GLCC System asset, who abuse the rights of other clients, or who refuse to cease improper behavior, may have disciplinary action taken against them up to and including dismissal from the College.

Violation of the policies herein may result in one or more of the following, plus any additional actions deemed appropriate by Information Technology:

Suspension of one's ability to perform interactive logins on relevant GLCC System assets
Suspension of one's ability to send or receive email
Increased monitoring of further GLCC System activity

Upon taking action, Information Technology staff will issue a written notification to the client within 24 hours. The notice will clearly state which policies are in violation. The notification will also identify the Director of Technology (the "policy agent") as the one who enacted the suspension. The suspended client must contact the policy agent regarding the suspension. After discussing the violation, the policy agent may alter the suspension as appropriate or keep it in force.

In the event that the client and the policy agent are unable to resolve the matter to the client's satisfaction, he or she may appeal in writing to the Vice President of Finance and Operations within five business days. The decision of the Vice President of Finance and Operations will be considered final except in cases where other College policy may supersede this policy or in the event the Vice President of Finance and Operations is himself/herself the violator. If the Vice President of Finance and Operations is the alleged violator the President of the College will be presented with the case and determine its resolution. In the case of employees, the policy agent will forward copies of the violation and suspension to the employee's supervisor and the Vice President of Finance and Operations. In the case of students, the policy agent will forward copies of the violation and suspension to the Dean of Students.

If a student needs a revoked privilege to complete academic work, the student must obtain a note signed by a professor and the Dean of Students explaining why the privilege is required and submit

it to the policy agent. Only the minimum privileges needed to fulfill the student's academic activities will be restored. Any further abuse by the student in question will lead to this limited privilege being revoked and the student will have to endure the consequences of his or her actions.

Policy Revisions

Great Lakes Christian College reserves the right to change this policy at any time. Great Lakes Christian College will make the most up-to-date version of the policy available to all employees and actively enrolled students and, in its discretion, provide users with additional notice of significant changes. A user's continued use of any GLCC System assets after any changes are published binds the user to the revised policy.

Effective Date: July 1, 2015

Violation

Penalties for violation of this Policy include, but may not be limited to, the following:

- Warning: Alerting an account holder to a regulation with the understanding that any recurrence of the behavior will result in disciplinary action.
- <u>Loss of computer privileges</u>: Limitation or removal of computer privileges, including restriction from the use of computer facilities for a period specified by College officials.
- Reimbursement for damages: Reimbursement for repairs to computer-related material, equipment, hardware, software, and/or facilities.

Section G: Other Policies

Alcohol and Other Drug Policy (AOD)

Great Lakes Christian College will adopt and implement a program to prevent the unlawful possession, use or distribution of illicit drugs and alcohol by students and employees. This program will incorporate the certification requirements of the Drug-Free Schools and Communities Act (DFSCA) of 1989, as articulated in the Education Department General Administrative Regulations (EDGAR) Part 86.

Standard of Conduct and College Sanctions

Great Lakes Christian College prohibits the unlawful possession, use, or distribution of drugs and alcohol by faculty, staff, and students on college property or at any college activity. The Employee Handbook, Faculty Handbook, and Student Handbook contain such prohibitions and provide sanctions for violation, up to and including discharge for employees and dismissal for students.

Legal Sanctions

Municipal, state, and federal laws strictly outline penalties--including fines and jail terms--for the illegal use, possession, or distribution of alcohol and drugs. Specific references to laws appear below.

Health Risks

The use of illicit drugs and the abuse of alcohol present major health risks, such as addiction, acute and chronic illness, and death. Other risks associated with alcohol and drug use include impaired learning, violence, injuries, accidents, drunk driving, acquaintance rape, unplanned pregnancies, and sexually transmitted diseases.

Treatment Programs

Alcohol and drug information, referral, counseling, treatment, and rehabilitation programs are available to faculty, staff, and students through a variety of on- and off- campus resources. Some of these services and programs are without charge; other are covered by insurance or based on ability to pay. Students may obtain further information about available services by calling Sparrow Health Care Systems – St. Lawrence, Addictions/Psychiatry Program, Lansing, MI, (517) 374-7650.

All faculty, staff, and students with questions, concerns, or problems related to the use of illicit drugs or the abuse of alcohol are urged to take immediate advantage of the help that is available. All members of the college community, however, must clearly understand that they jeopardize their education, their jobs, their health, and their future if they unlawfully possess, use, or distribute drugs or alcohol at Great Lakes Christian College. Sanctions for such misconduct will be consistently enforced.

The Federal Government and the State of Michigan decide if and how a drug should be controlled. Prescription drugs psychoactive (mind-altering) are categorized according to a Schedule I-V which tells under what conditions a physician can prescribe the drug. This schedule also includes a drug's known and potential value, its potential for physical or psychological dependence, and the risk to

public health. Penalties for the illegal sale or distribution of a drug are established using the Schedule I-V.

Schedule I drugs have a high potential for abuse with no medical use. Production of these drugs is controlled. Examples include heroin, methaqualone, all hallucinogens (except phencyclidine-PCP), marijuana and hashish. Tetrahydrocannabinol (THC), depending on its form, can also be a Schedule II drug.

Schedule II drugs have a high potential for abuse, they also have some medical uses. Production of these drugs is also controlled. Examples include opium, morphine, codeine, some other narcotics, barbiturates, cocaine, amphetamines and phencyclidine (PCP).

Penalties for selling Schedule I and II drugs vary with the quantity of the drug. Additionally, if death or serious injury is associated with the sale, or if it is a second offense, penalties are more severe. When establishing penalties for sale, marijuana and hashish are separated from this designation according to the schedule. The penalties are similar to those set for Schedule I and II drugs. Federal penalties for first offense sale of small amounts of Schedule I and II drugs is not less than five years and not more than 40 years. In the case of death or serious injury, not less than 20 years and not more than life. There is also a fine for the second offense of not more than \$2 million of individuals and \$5 million for other than individual.

State penalties for "delivery possession with intent to deliver, and manufacture" of less than 25 grams is mandatory one to 20 years; up to \$25,000 fine, or life probation. The penalty for possession of less than 25 grams is up to four years, or a fine up to \$25,000, or both. Both offenses are felonies. Use of Schedule I and II drugs is a misdemeanor which has a penalty of up to two years, \$2,000 fine, or both.

Schedule III, IV and V drugs have some potential for abuse, but less than I and II. The potential for abuse of Schedule IV drugs is less than Schedule III, and Schedule V is less than IV. All drugs in this category have medical uses, and their production is not controlled. Examples include some narcotics, chloral hydrate (IV), barbiturates (III), other depressants (III and IV), amphetamines (III), and other stimulants (III and V).

Federal penalties for a first offense sale of a Schedule III drug is not more than five years, and a fine of not more than \$250,000 per individual, and \$1 million, not individual. The penalty for first offense sale of Schedule IV drugs is not more than three years. The fine is the same as for Schedule III drugs. The penalty for first offense sale of Schedule V drugs is not more than one year and a fine of not more than \$100,000 per individual or \$250,000, not individual.

State penalties for the sale of some Schedule III drugs is a felony and has a penalty of up to seven years, or a fine of up to \$5,000, or both. The penalty for the sale of Schedule IV drugs is also a felony and has a penalty of up to four years, or a fine up to \$2,000, or both. The sale of Schedule V drugs is a felony too, and has a penalty of up to two years, or a fine up to \$2,000, or both.

Michigan Ordinances

- I. OUIL (Operating Under the Influence of Alcohol)
 - A. Description: A person, licensed or not, under the influence of alcohol, or drugs, or both.

- B. Penalty: First arrest not more than 90 days, or \$100-\$500 fine, or both.
- II. Permitting Person Under the Influence to Drive
 - A. Description: Allowing intoxicated person to drive in an area open to the public.
 - B. Penalty: Not more than 90 days, or \$100-\$500 fine, or both.
- III. Minor Possessing or Transporting in a Motor Vehicle
 - A. Description: Persons under 21 may not possess or transport alcohol in a vehicle.
 - B. Penalty: Not more than 90 days, or a fine of not more than \$100. Vehicle can be impounded.
- IV. Purchase/Possess/Consume by Minor
 - A. Description: Persons under 21 may not purchase, possess, or consume alcohol.
 - B. Penalty: Civil infraction: first arrest \$25, second arrest \$50, and third arrest \$100.
- V. Impaired Driving
 - A. Description: A person driving in an area open to the public while impaired from alcohol, drugs, or both.
 - B. Penalty: Not more than 90 days, or a fine of not more than \$300, or both.

Alcohol Policy

Listed below are the standards of the Great Lakes Christian College community regarding the use of alcoholic beverages. The context for these community standards is that Great Lakes Christian College expects all faculty, staff, and students to comply with the state of Michigan laws about alcoholic beverages. In the state of Michigan, persons under the age of 21 shall not purchase, consume, or possess alcoholic beverages. In addition, it is against Michigan law to sell or furnish alcoholic beverages to persons under 21 years of age. The goal of the community is that faculty, staff, and students will make responsible choices about whether or not to use alcoholic beverages. A responsible choice will vary from individual to individual. Because most Great Lakes Christian College students are under the legal drinking age, their choice should be abstinence; for those of legal drinking age, it should be abstinence or moderation. Some must choose abstinence because of their high risk for alcoholism. Everyone in our community, before consuming alcohol, should carefully consider their witness to others and the possible impact on others' decision of whether or not to consume alcohol. The laws of the state of Michigan and the community standards ought to guide our community in decisions about alcoholic beverage use. Those who fail to respect these laws and standards risk the sanctions of this community.

A. Possession and Consumption:

Great Lakes Christian College prohibits the possession and consumption of alcoholic beverages on College premises and at authorized College activities off college premises. The College also expects students who are underage to comply with state of Michigan laws regarding the possession and consumption of alcoholic beverages.

B. Alcohol Containers:

Great Lakes Christian College prohibits the possession of any alcoholic beverage containers anywhere on College premises including vehicles.

C. Drunkenness:

Great Lakes Christian College expects faculty, staff, and students of legal drinking age who choose to drink alcoholic beverages to be moderate in their consumption. Any consumption of alcoholic beverages that results in impairment or intoxication is a violation of community standards.

Tobacco Policy

Great Lakes Christian College is a tobacco-free campus. Possession and use are prohibited while on campus or at a College sponsored event or trip. Violators of this policy will be turned over to the GLCC Judicial Advisor.

Employees Sanctions

Controlled Substances

Great Lakes Christian College holds a zero-tolerance policy for the abuse of controlled substances (in line with the Drug Free Schools and Communities Act and the Department of Education's supporting regulations (EDGAR Part 86 Subpart A 86.3). Most importantly, the intellectual, spiritual, and personal growth and well-being of both the individual and community is best served by holding everyone accountable for the use of such substances. Sanctions for violation of the controlled substances policy:

- Zero tolerance means that misuse of a controlled substance will result in automatic dismissal
- Employees will be given 24 hours to remove their belongings from campus depending on the severity of the issue. In some cases employees may be asked to leave campus immediately and arrangements will be made to obtain their belongings.
- Possession of a controlled substance on campus property will be reported to and dealt with by the local authorities.

Alcohol and Tobacco

The severity of the sanction will reflect the seriousness of the incident, employee's history of previous violations, and work evaluations. Sanctions will range from:

- Warning
- Probation
- Termination

Medical Marijuana Policy

Medical marijuana, which is prescribed for healing purposes, is prohibited at Great Lakes Christian College even though there may be State and local laws that permit its use.

Background: Great Lakes Christian College receives federal funding through Title IV in the form of student financial aid (grants, loans, and work-study programs). As a condition of accepting this money, Great Lakes Christian College is required to certify that it complies with the Drug-Free Schools, and Communities Act (DFSCA) of 1989, as articulated in the Education Department General Administrative Regulations (EDGAR) Part 86. The federal government regulates drugs through the Controlled Substances Act (CSA) (21 U.S.C. A 811) which does not recognize the difference between medical and recreational use of marijuana. Thus, to comply with the Federal Drug Free School and Communities Act and avoid losing federal funding, Great Lakes Christian College must prohibit all marijuana use, including medical marijuana, and provide sanctions for its use.

Primary Prevention Plan

Environmental Management

1) Provide drug-free social gatherings and service opportunities.
GLCC's Department of Student Development is committed to providing weekly dormitory events, large on-campus events each month, and trips throughout each semester that provide an opportunity for students to create friendships and build a sense of belonging that results without the consumption of alcohol.

2) Promote Health-Conscious Living

Coordinating with Creative Dining services Great Lakes Christian College works to provide students with nutritional information and advice for healthy living. Using a variety of programs including Men's and Women's health months, Residence Hall fitness challenges, Fresh Healthy Vending, and intramural sports. Great Lakes Christian College works to encourage students to live an active life and make wise choices in regards to their personal health.

3) Limit the availability of drugs on campus

In accordance with Federal and State of Michigan standards, Great Lakes Christian College is committed to enforcing a drug free campus. Students who violate any of these campus standards risk being suspended or expelled from GLCC.

Preventative Education

1) New Student Orientation

Included in our week of New Student Orientation is the communication of our Core Values and Student Handbook. The main purpose of this is to communicate to students the campus identity GLCC is working to create. Part of our identity is valuing responsible consumption of alcohol and prohibiting the consumption of alcohol by minors. Students are exposed to many statistics and national trends in regards to alcohol consumption and binge drinking and so are provided the names and contact information of staff who can be reached if they ever need assistance.

2) All Hall meetings

At the beginning and end of each semester residential on-campus students are required to attend an all Hall meeting. One of the purposes of these meetings is to discuss the expectations Residence Life personnel have for our on-campus student community. These meetings also address issues that have arisen throughout the semester. All Hall meetings provide an opportunity to explain to students why we are an alcohol-free campus and the risks associated with consuming alcohol. It also offers to remind students of the staff who are always willing to support them if they need assistance in dealing with addiction or abuse of alcohol.

3) Men's and Women's Health month programming

Great Lakes Christian College sets aside October and November to focus on health issues that affect respective genders such as Breast Cancer and Testicular Cancer. The larger purpose of these months is to focus on the importance of holistic personal health and provide students with educational-based programming. The programming includes lectures from visiting doctors or nurses, health challenges, daily health facts, panel discussions on current health

issues, and fund raisers for foundations related to specific health causes. The programs include all aspects of personal health including the damage of alcohol abuse and drug addiction.

Student Support

1) Amnesty Policy

If students are struggling with alcohol abuse, addiction, or binge drinking and seek assistance and help on their own accord they will not be punitively disciplined by the Student Conduct Committee. Great Lakes Christian College strongly encourages students to seek help when they need it so when one comes forward asking for help, he or she will be given it. The Amnesty Policy carries the expectation that a student seeking help truly wants to change and will do their part to make it happen. If, under the discernment of the Dean of Students and the Student Conduct Committee, it is determined a student is not making notable improvements in the habits regarding alcohol the student may open himself or herself up for sanctions from the Student Conduct Committee.

2) Counseling

A GLCC counseling intern is willing to meet free of charge with any student who desires it. If the student isn't comfortable meeting with the intern, the Dean of Students, Campus Life Coordinator, and other staff and faculty are willing to meet with students to provide counsel, accountability, and guidance.

Annual Notification

Great Lakes Christian College will provide written notification to students and employees on an annual basis of the College's Alcohol and Illegal Drug Policy as required (EDGAR Part 86 Subpart A 86.3). GLCC will make every effort to ensure distribution (opposed to simply making them available) to each and every student and employee. The notification will include the entire policy that includes the following requirements:

- 1. Standards of Conduct that clearly prohibit, at a minimum, the unlawful possession, use, or distribution of illicit drugs and alcohol by students and employees.
- 2. A list of applicable legal sanctions under federal, state, or local laws for the unlawful possession or distribution of illicit drugs and alcohol.
- 3. A description of the health risks associated with the abuse of alcohol or use of illicit drugs.
- 4. A list of drug and alcohol programs (counseling, treatment, rehabilitation, and re-entry) that are available to employees or students.
- 5. A clear statement that GLCC will impose disciplinary sanctions on students and employees for violations of the standards of conduct and a description of those sanctions, up to and including expulsion or termination of employment and referral for prosecution.

Discrimination Policies and Grievance Procedures

Notice Regarding Title IX Grievance Procedure

Pursuant to regulations at 34 C.F.R. §106.9, Great Lakes Christian College does not discriminate on the basis of sex in admission to or employment in its education programs or activities. Inquiries concerning the application of Title IX and its implementing regulations may be referred to the College's Title IX Coordinator or to the Office for Civil Rights of the U.S. Department of Education. This notice is also to inform you that, in keeping with the

College's policy of non-discrimination, the College adopted a grievance procedure for reporting claims of sex discrimination under Title IX. The Title IX grievance procedure, which pertains to how sex discrimination grievances will be handled by the College, will be posted on the College website. A copy of the grievance procedure may be obtained from the Vice President of Finance and Operations by calling (517) 321-0242 (ext. 212), or by visiting the Vice President's office at 6211 W. Willow Hwy, Lansing, Michigan 48917. A copy is also available from the Dean of Students, by calling (517) 321-0242 (ext. 213) or by visiting the Dean's office at 6211 W. Willow Hwy, Lansing, Michigan 48917.

Adopted June 24, 2014

Grievances by Employees (not related to Title IX):

Informal Grievance Process –

Disagreements or difficulties may occur even among Christians. It is the desire of Great Lakes Christian College that such circumstances be resolved in the spirit of the teaching of Jesus Christ (Matthew 18: 15-18). This informal process begins when parties involved address concerns personally with each other. If a second step is required, the issue should be presented to the next highest supervisor in the organizational chain of accountability. In the event the situation remains unresolved the matter may be taken to the highest Administrative Staff member or Executive Administrator who oversees the department. Having followed these steps, an employee who is not satisfied with previous attempts to resolve the problem may begin the formal grievance process.

Formal Grievance Process –

- (a) The grievant will submit a typewritten document to the Administrative Council stating the nature of the complaint, the evidence on which it is based, the action which has already been taken to resolve the matter, and the action desired.
- (b) The Administrative Council will appoint a Grievance Committee of no less than three uninvolved people, including an Administrative Council member, to investigate and consider the grievance.
- (c) The Grievance Committee will then consider options and recommend action to the Administrative Council.
- (d) The Administrative Council will notify the grievant in writing regarding its decision and/or action required of the grievant.
- (e) Should the Administrative Council's conclusion and/or required action not be acceptable to the grievant, her/she may appeal to the College President whose decision will be final.

Policy on Sex, Sexuality, and Gender Identity

Affirming the dignity of every person and response as a Christian community:

Great Lakes Christian College affirms the full humanity and dignity of every human being, regardless of his or her sexual orientation or gender identity. Among the sins that the Bible clearly condemns are sexual immorality and homosexual behavior (1 Corinthians 6:9-11). We recognize that there are individuals within our community who experience same-sex attraction, and/or confusion about gender. They are loved and valued and we condemn any malice directed toward them.

As an institution of higher education, we encourage the vigorous pursuit of truth. As a Christian institution, we believe the Bible, as illuminated by the Holy Spirit, is true and reliable. We recognize that there are Christians inside and outside our community who have different interpretations of Scripture. The Great Lakes Christian College statement concerning sexuality is in line with the teachings of the Christian Churches/Churches of Christ. Regardless of one's perspective or tradition, we encourage all of our community members to engage this issue with civility and respect.

Great Lakes Christian College's position, as communicated in the Great Lakes Christian College Student Handbook:

We believe that human families were established by God to perpetuate humankind and to provide a stable community for nurturing children in faith and righteous living. Marriage between one man and one woman is the instruction of Scripture and sexual expression is to be confined to the marriage relationship.

The Student Community Standard regarding sexual expression:

All students, regardless of age, residency, or status, are required to abstain from cohabitation, any involvement in premarital or extramarital sexual activity, or homosexual activity (including same-sex dating behaviors). This includes the promotion, advocacy, and defense of the aforementioned activities.

We recognize that this belief and instruction may be in conflict with the practice or vision of the larger culture, as Christian beliefs have been in other times and places. That said, we hold to the Biblical Christian position on this issue while being respectful of those who disagree with us. Students who violate our community standards regarding sexual expression will meet with the Student Conduct and Restoration Committee and be treated in a loving, redemptive manner throughout the accountability process.

Great Lakes Christian College understands gender to be a matter of primary, overt sexual characteristics at birth, other than in cases in which these characteristics are ambiguous. We intend to allow the Bible to guide us to reaffirm the birth gender of individuals (Matthew 19:4, Mark 10:6).

We acknowledge that there are persons who genuinely experience gender confusion. We regard such confusion as evidencing at least some degree of spiritual confusion warranting pastoral care, though not necessarily any greater spiritual need than presents itself in other forms among our student and employee populations. That said, the actions and behaviors that sometimes result from gender confusion can be disruptive and contrary to a community seeking to encourage persons in our care towards an understanding of personal identity and holiness rooted in the truth of Christ.

Therefore, since college is traditionally a time of personal exploration, growth. and change, we do not seek to exclude persons for whom sexual identity is an issue. However, we do reserve the right to terminate or deny enrollment of those whose influence upon our community is determined to be in our judgment contrary to the best interests of our students and commitments to our College and to our Lord. Therefore, Great Lakes Christian College will not support persistent or conspicuous examples of cross-dressing or other expressions or

actions that are deliberately discordant with birth gender, and will deal with such matters within the appropriate pastoral and accountability process.

Great Lakes Christian College reserves the right to examine situations on an individual basis, taking into consideration the unique characteristics of a given issue or person while upholding the teaching of the Christian churches/churches of Christ, Great Lakes Christian College's Doctrinal Statement of Faith, and the community standards addressed in the Faculty, Employee, and Student Handbooks. The Great Lakes Christian College Board of Trustees has the final authority and responsibility for the interpretation of our Doctrinal Statement of Faith, community standards, and of the Biblical principles that serve as their foundation.

Adopted March 2015

Sexual Harassment

Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when: (1) submission to such conduct is made either explicitly or implicitly a term or condition of instruction, employment, or otherwise full participation in college life; (2) a submission to or rejection of such conduct by an individual is used as a basis for evaluation in making academic, or employment, or personnel decisions affecting an individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's performance or creating an intimidating, hostile, or offensive college environment.

While this problem is unlikely at Great Lakes Christian College, it is emphasized that it would not be tolerated. Any employee believing himself or herself to be the victim of such practice should report it immediately to the Vice President Finance & Operations or the College President. (See section on "Grievance Procedures".)

The Two Adult Rule, which requires that at least two screened adults be present at every function and in each classroom, vehicle, or other enclosed area during all activities involving children, youth, or vulnerable adults, is to be followed and will be enforced. (A vulnerable adult is identified as one who is unable to protect himself or herself from abuse, neglect, or exploitation because of a mental or physical impairment or because of advanced age.)

<u>Title IX – Sexual Misconduct Policy</u>

I. INTRODUCTION

Great Lakes Christian College is a Christ-centered institution of higher education that is committed to the Biblical principle that all human beings are created in the image of God. Because of that belief, the College is committed to basing judgments concerning the admission, education, and employment of individuals upon their qualification and abilities.

Great Lakes Christian College is also committed to maintaining and strengthening an educational, working, and living environment founded on the Biblical principles of love and mutual respect. The College seeks to provide programs, activities, and an educational

environment free from sex discrimination. In accordance with this policy and as delineated by federal and Michigan law, Great Lakes Christian College does not discriminate on the basis of sex in education programs or activities, including but not limited to recruitment, admissions, housing, athletic and extracurricular activities, discipline, distribution of financial assistance, distribution of institutional resources, hiring practices, employment, promotion, and policies. A relevant portion of Title IX states as follows:

"No person in the United States shall, on the basis of sex, be excluded from participation in, or be denied the benefits of, or be subjected to discrimination under any educational program or any activity receiving Federal financial assistance."

The College is committed to promoting respect for the bodily integrity of all persons, the virtues of chastity, and the sacredness of human sexuality. The College affirms that sexual relationships are designed by God to be expressed solely within a marriage between husband and wife. Sexual acts of any kind outside the confines of marriage are inconsistent with Biblical principles and are prohibited by College policies.

"Sexual Misconduct", as that term is used in this policy, means any form of sex discrimination prohibited by Title IX. Sexual misconduct is antithetical to the standards and ideals of the College community and will not be tolerated. Great Lakes Christian College recognizes the spiritual, moral, legal, physical, and psychological seriousness of all sexual misconduct, regardless of the level of acquaintance between the perpetrator and the victim, however casual. Great Lakes Christian College aims to eradicate sexual misconduct through education, training, clear policies, and serious consequences for violations of these policies.

In addition, the College recognizes that sex discrimination, in any form, is a violation of College regulations and policies. Sex discrimination includes all forms of sexual violence and sexual harassment. Further, the College recognizes that sexual violence is a serious threat to the College community, is prohibited by Title IX, and is a criminal act. Therefore, the College is committed to providing the following to the members of the College community:

- 1. A statement of expectations for behavior with regard to community standards pertaining to sex discrimination.
- 2. Resources aimed at reducing the risk of sexual violence, including educational programs for men and women.
- 3. Procedural intervention to offer support and information following the report of sex discrimination.
- 4. Student conduct and employee disciplinary procedures that address the needs of victims and protect the rights of the alleged assailants.

The College will take immediate action to address sex discrimination promptly and to equitably investigate complaints to resolve the situation, prevent its reoccurrence, and address its effects by implementing awareness and/or preventative measures.

II. DEFINITIONS

A. College

College means Great Lakes Christian College, Lansing, Michigan.

B <u>College Community</u>

For the purposes of this policy, "College Community" includes all students, staff, faculty, administration, trustees, interns, volunteers, and visitors. In addition, this policy shall also apply to instances of sex discrimination which occur on Collegeowned, operated, or affiliated properties, as well as incidents of sex discrimination that occur off campus, including but not limited to instances involving members of the College Community who are conducting College business off campus or conduct that occurred at the permanent or temporary local residence of a College student, employee, or third party.

C. <u>College Student</u>

College Student means any person who is registered or enrolled at the College at the time of the alleged sex discrimination.

D. <u>Effective Consent</u>

All College standards provide that sexual activity outside of marriage is prohibited. In addition, sexual activity requires consent as a matter or federal and state law. Such consent is defined as clear, unambiguous, and voluntary agreement between the parties.

Consent cannot be obtained from someone who is under 18 years of age, asleep or otherwise mentally or physically incapacitated, whether due to alcohol, drugs, or some other temporary or permanent, physical or mental disability or condition. Consent cannot be obtained by threat, coercion, or force. Agreement given under such conditions does not constitute consent.

E. Employee

Employee means any person employed by the College, whether as a trustee member, administrator, faculty, adjunct faculty, or staff member, whether full-time, part-time, or volunteer.

F. Force

Force means physical force, violence, threat, intimidation, or coercion.

G. Grievant

A student (including a former student if the alleged discrimination occurred while enrolled at the College), employee, or other member of the College community defined above, who contemplates filing or actually files a complaint based on sex discrimination.

H. Respondent

A person alleged to have committed a violation of the College Title IX policy. The term may be also used to designate persons with direct responsibility for a particular action or to those persons with supervisory responsibilities for conduct, procedures, or policies in those areas covered by the complaint.

I. Sex Discrimination

For the purposes of this policy, "sex discrimination" shall include, but not be limited to, any acts of sexual violence, sexual assault, and sexual harassment. In compliance with Title IX of the Educational Amendments of 1972, sex discrimination applies to, but is not limited to: recruitment, admissions, housing, athletic and extracurricular activities, rules and regulations, discipline, class enrollment, access to programs, courses and internships, distribution of financial assistance, distribution of institutional resources, hiring practices, employment, promotion, and policies.

J. <u>Sexual Assault</u>

Sexual assault is the commission of sexual contact or a sexual act, whether by an acquaintance or by a stranger that occurs without indication of consent of both individuals, or that occurs under threat or coercion.

When there is a lack of mutual consent about sexual activity, or where there is ambiguity about whether consent has been given, an individual can be charged with, and found to have committed, sexual assault or another form of sexual misconduct.

Much sexual misconduct includes nonconsensual sexual contact, but contact is not a necessary component. Threatening speech which is sufficiently serious to constitute sexual harassment, for example, will constitute sexual misconduct. Photographs, videos, or other visual or auditory records of sexual activity made without explicit consent constitute sexual misconduct, even if the activity documented was consensual. Similarly, sharing such recordings without explicit consent is a form of sexual misconduct. For example, forwarding a harassing electronic communication may also constitute an offense.

In addition to being prohibited by federal and Michigan law, including Title IX of the Education Amendments of 1972, sexual assault could result in criminal prosecution or civil liability.

Reports of sexual assault will be reported to local law enforcement for appropriate action, including investigation and prosecution as appropriate. Such criminal prosecution will proceed separately and apart from a College investigation and disciplinary proceeding. The College will cooperate to the fullest extent possible, with any criminal investigation or prosecution of sexual assault incidents involving any member of the Great Lakes Christian College community. The College will not ordinarily wait for the conclusion of any criminal investigation or proceedings to commence its own investigation and may take interim measures to protect members of the College community.

All sexual assault reports shall be treated with gravity, dignity, and justice throughout the process. Members of the College community should <u>not</u> do any of the following:

- 1. Pressure anyone to suppress a report of sexual assault;
- 2. Cause anyone to believe that he or she is responsible for the commission of any crime against him or her;

- 3. Communicate to anyone that he or she was contributorily negligent or assumed the risk of being assaulted by reason of circumstance, dress, or behavior; or
- 4. Communicate to anyone that the College would incur unwanted publicity as a result of a report of sexual assault.

K. Sexual Contact

Sexual contact means the deliberate touching of a person's intimate parts (including genitalia, groin, breast or buttocks, or clothing covering any of those areas) for the purpose of sexual gratification, or using force to cause a person to touch his or her own or another person's intimate parts.

L. <u>Sexual Harassment</u>

Sexual harassment is antithetical to Biblical and academic values and to a community environment free from the fact or appearance of coercion. Sexual harassment is a form of sex discrimination, a violation of College policies, and may result in serious disciplinary action. Sexual harassment consists of nonconsensual sexual advances, request for sexual favors, or other verbal or physical conduct of a sexual nature on or off the College campus when:

- 1. Submission to such conduct is made either explicitly or implicitly a condition of an individual's employment or academic standing, or
- 2. Submission to or rejection of such conduct is used as the basis for employment decisions or for academic evaluation, grades, or advancement; or
- 3. Such conduct has the purpose or effect of unreasonably interfering with or limiting an individual's work or academic performance, or creating an intimidating or hostile academic or work environment.

Sexual harassment may be found in a single episode as well as persistent behavior. Conduct that occurs in the process of application for admission to a program or during selection for employment, and conduct directed toward a member of the College Community is covered by the policy. In addition, conduct by third parties (i.e. individuals who are neither students nor employees, including but not limited to invited guests and consultants) is covered by this policy.

Both men and women are protected from sexual harassment and sexual harassment is prohibited regardless of the sex of the harasser. Sexual harassment is a matter of particular concern to an academic community in which students, faculty, and staff are related by strong bonds of intellectual and spiritual interdependence and trust.

M. Sexual Violence

Sexual violence is a form of sexual harassment prohibited by Title IX. Sexual violence includes any physical sexual act perpetuated against a person's will or where the person is incapable of giving consent. Sexual violence includes, but is not limited to, rape, sexual assault, sexual battery, and sexual coercion.

N. Standards of Conduct

Standards of conduct means the College's standards of conduct as approved by the College's Administrators and/or Board of Trustees and published in the appropriate College handbooks.

O. Third Party

Third party means any individual, including a contractor or invited guest, who is alleged to have committed sexual misconduct against a College community member.

III. TEACHER – STUDENT CONSENSUAL RELATIONS

The integrity of the teacher-student relationship is the foundation of the College's educational mission. This relationship vests considerable trust in the teacher, who in turn, bears authority and accountability as a mentor, educator, and evaluator. The unequal institutional power inherent in this relationship heightens the vulnerability of the student and the potential for coercion. The pedagogical relationship between teacher and student must be protected from influences or activities that can interfere with learning and personal development.

Whenever a teacher is [or in the future might reasonably become] responsible for teaching, advising, or directly supervising a student, an amorous relationship between them is inappropriate and should be avoided. In addition to creating the potential for coercion, any such relationship jeopardizes the integrity of the educational process by creating a conflict of interest and may impair the learning environment for other students. Finally, such situations may expose the College and the teacher to liability for violation of laws against sexual harassment and sex discrimination.

For purposes of this policy, "direct supervision" includes the following activities (on or off campus): course teaching, examining, grading, advising, research, supervising other academic and social activities, and recommending for admissions, employment, internships, or awards.

"Teachers" includes, but is not limited to, all full-time, part-time, and adjunct faculty of the College. It also refers to those serving as guest or substitute instructors.

"Students" refers to those enrolled in any and all educational and training programs of the College.

Additionally, this policy applies to members of the College Community who are not teachers as defined above, but have authority over or mentoring relationships with students, including athletic coaches, supervisors of student employees, advisors, directors of student organizations, residential advisors, as well as others who advise, mentor, or evaluate students.

Teachers or students with questions about this policy are advised to consult with the College's Title IX Coordinator, the Dean of Students, or their supervising Vice President.

IV. OTHER RELATED MISCONDUCT

In accordance with this policy, the College is empowered to investigate allegations of, and to impose sanctions for, sex discrimination, sexual harassment, or any other violations of the College's standards of conduct directly related to the allegations brought under this policy. Such related misconduct may include, without limitation, incidents of domestic violence, dating violence, and stalking as those terms are defined by state and federal laws. Violations of the rules of confidentiality as articulated herein, violations of any interim measures imposed under this policy, and/or violations of other Standards of Conduct that occur in connection with the alleged sexual misconduct may also implicate the use of this policy.

The College reserves the right to extend grace through mitigation or avoidance of disciplinary action against a Grievant or witness of his or her improper use of alcohol or drugs, provided that such person is acting in good faith as a Grievant or witness to the events of the alleged sexual misconduct.

V. TITLE IX COORDINATOR

- A. The Title IX Coordinator is the individual designated by the College to coordinate the College's efforts to comply with and enforce the responsibilities of the College under this policy in accordance with pertinent Title IX regulations.
- B. The College's Title IX Coordinator is the Vice President of Finance and Operations, 6211 West Willow Highway, Lansing, MI 48917, phone (517) 321-0242 ext. 212.
- C. The College has designated the duties and responsibilities of the Title IX Coordinator to:
 - 1. Appoint Deputy Title IX Coordinators as needed;
 - 2. Ensure coordination with the Deputy Title IX Coordinators and appropriate staff with relevant responsibilities for such activities on campus as housing, counseling services, and campus safety.
 - 3. Prepare and arrange for a preventative education program. Such program will include information designed to encourage students to report incidents of sexual violence to the appropriate College and law enforcement authorities.
 - 4. Develop specific sexual violence materials that include the College's policy, rules, and resources for students, faculty, coaches, and administrators and arrange for such materials to be included in all appropriate handbooks. These materials would include:
 - a. What constitutes sexual harassment or violence;
 - b. What to do if a student has been the victim of sexual harassment or violence;
 - c. Contact information for counseling and victim services on and off College grounds;
 - d. How to file a complaint with the College;
 - e. How to contact the College's Title IX Coordinator(s);
 - f. What the College will do to respond to allegations of sexual harassment or violence, including interim measures that can be taken as outlined in the Grievance Procedure.
 - 5. Analyze periodically any trends or patterns of sexual misconduct on campus and assess the efficacy of campus-wide response to sexual misconduct.

- 6. Disseminate to members of the College community information regarding Title IX protections, the College's Title IX policy, including the Complaint Resolution Process therein, and assistance for all persons who have been subjected to sexual harassment or violence.
- 7. Conduct an annual review of all Title IX complaints brought to the College Title IX Coordinator.
- 8. Communicate with Student Development regarding the College's obligations under Title IX and serve as a resource regarding Title IX matters.
- 9. Develop a protocol with the College's Student Development department regarding complaints of sexual misconduct.
- 10. Annually assess the College's overall Title IX compliance efforts.
- D. In addition, the Title IX Coordinator will arrange for and conduct training (at least annually) for the College administration, faculty, and staff.

VI. COMPLAINT RESOLUTATION PROCESS

A. <u>Confidentiality</u>

The College shall protect the privacy of individuals involved in a report of sex discrimination to the extent allowed by law and College policy. Communications to health and counseling professionals may be privileged and confidential. Because the content of discussions with confidential resources is not reported to the College office of record such discussions do not serve as notice to the College to address the alleged discrimination or sexual misconduct.

In the event of a report of sex discrimination being received by other College officials including administration, faculty and staff, such officials are required by law to relay such reports to the Title IX Coordinator and, in some instances, to law enforcement officials. In such cases, the College will balance the needs of the parties for privacy with the College's responsibility to ensure a safe educational environment and workplace. In some cases, strict confidentiality may not be possible or appropriate. An individual's request regarding the confidentiality of reports of discrimination or sexual misconduct will be considered in determining an appropriate response; however, such request will be considered in the dual context of the College's legal obligation to ensure a working and learning environment that is free from discrimination or sexual misconduct and the rights of the accused to be informed of the allegations and their source. Some level of disclosure may be necessary to ensure a complete and fair investigation.

B. <u>Definitions of Parties</u>

<u>Grievant</u>: A student (including a former student if the alleged discrimination occurred while enrolled at the College), employee, or other member of the College community defined above, who contemplates filing or actually files a complaint based on sex discrimination.

Respondent: A person alleged to have committed a violation of the College Title IX policy. The term may be also used to designate persons with direct responsibility for

a particular action or to those persons with supervisory responsibilities for conduct, procedures, or policies in those areas covered by the complaint.

C. <u>Preliminary Stage</u>

A member of the College Community who believes that he or she is experiencing or has experienced sex discrimination of any kind may initially wish to discuss the situation with a trusted friend, advisor, colleague, or the College official to whom the alleged Respondent reports or is responsible. The College strongly recommends that the potential Grievant not contact unaccompanied the person who is alleged to have committed the inappropriate conduct.

D. Report to the Title IX Coordinator

Any member of the College community who believes that he or she has experienced or is experiencing sex discrimination should immediately contact the College Title IX Coordinator to report the alleged act or acts of sex discrimination. (In the event of alleged sexual harassment, the aggrieved person may choose to file a complaint pursuant to the College's Sexual Misconduct Policy. Such report should be submitted to the Title IX Coordinator.)

E. <u>Informal resolution process</u>

At any time during the grievance process, the Title IX Coordinator may inquire of the parties if they wish to participate in an informal resolution of the grievance. If both the grievant and the respondent agree to do so, the Title IX Coordinator will meet with them informally to attempt to resolve the grievance. If a resolution of the grievance is reached between the parties, the agreement shall be reduced to writing and signed by the grievant and the respondent, the grievance will be considered resolved and no further action will be taken on the grievance.

F. Response of the Title IX Coordinator

Upon receipt of notice of any allegation under this policy the Title IX Coordinator will begin the grievance procedures outlined in the Grievance Procedure document:

Schedule a meeting with the Grievant in order to provide the Grievant a general understanding of this policy (and a copy of the policy, if necessary) and to identify forms of support or immediate interventions available to the Grievant, such as health services, mental health services, crime victim services, or services of a local rape crisis center. The meeting will cover any interim measures or accommodations that may be appropriate under the circumstances. Upon the receipt of notice of allegations pursuant to this policy, regardless of the action chosen by the Grievant, the College will undertake an appropriate inquiry and take such prompt and effective action as is reasonably practical under the circumstances to support and protect the Grievant. Such measures include a "no contact" order which will typically direct that the parties refrain from having contact with one another, directly or through proxies, whether in person or via electronic means. The Title IX Coordinator also may take any further protective action deemed appropriate concerning the interaction of the parties including, without limitation, directing appropriate College officials to alter the student's academic, housing, or employment arrangements, providing an escort for the Grievant, and/or

- any other measure deemed appropriate by the Title IX Coordinator. Violations of the Title IX Coordinator's directives and/or protective actions may lead to additional disciplinary action.
- 2. Advise the Grievant of his or her rights and provide any needed assistance as follows:
 - a. The right to contact the appropriate law enforcement personnel to pursue criminal charges under state, local, or federal law. The Grievant should be informed of his or her right to file a criminal complaint concurrent with or after the College's Title IX investigation. The College investigation will not be suspended or delayed in the event of an investigation of possible criminal charges by law enforcement personnel.
 - b. The right to file a civil action against the alleged Respondent.
 - c. The right to file a complaint with the Equal Employment Opportunity Commission and/or the Michigan Civil Rights Commission.
- 3. In addition the Title IX Coordinator will provide assistance in arranging for needed medical or hospital treatment, counseling, and the personal safety of the Grievant.

G. Optional Pre-Complaint Meeting

Following contact with the Title IX Coordinator, but prior to the submission of a formal written complaint to the Title IX Coordinator, the Grievant may request a meeting with the Respondent alleged to be directly responsible for the violation or with the person having immediate supervisory authority related to the complaint. Such meeting shall be in the presence of the Title IX Coordinator. In addition, the persons identified above who are alleged to be directly or indirectly responsible for the violation of this policy may discuss the allegations of the Grievant with the Title IX Coordinator. The purpose of any pre-complaint contact will be for the Grievant to request a proposed course of action in order to resolve the matter in a manner consistent with Biblical principles of dispute resolution. Such pre-complaint meetings shall be solely at the option of the Grievant. At no time will the Grievant be required to confront the Respondent. In cases involving sexual assault, such a meeting shall not occur. Such contact is not a condition for the submission of a written complaint to the Title IX Coordinator. If the matter cannot be resolved as the result of any precomplaint meeting, then the Grievant may submit to the Title IX Coordinator a formal, written complaint. If it is alleged that the Title IX Coordinator is involved in any discriminatory action, then the complaint shall be submitted to a Deputy Title IX Coordinator or another individual appointed by the President of the College to serve as a substitute Title IX Coordinator.

H. Written Complaint

If the pre-complaint meeting does not resolve the complaint, or if such meeting is not held, the Grievant shall then have the right to file a written complaint with the Title IX Coordinator which shall contain the following information:

- 1. The name and address of the Grievant.
- 2. The name or names of the person or persons alleged to be responsible for the act of discrimination, if known.
- 3. Specific acts of discrimination alleged including the dates, times, and locations.

- 4. Names, addresses, and telephone numbers of potential witnesses who may be called in support of the complaint.
- 5. A description of any actions taken by any party in an effort to address the alleged discrimination.
- 6. The complaint shall be signed and dated by the Grievant. Such date shall be the "date of the complaint."

I. <u>Title IX Coordinator's Investigation</u>

After filing of the written complaint the Title IX Coordinator may assign the matter to a Deputy Title IX Coordinator for investigation. References in the section to the Title IX Coordinator may include any actions by a Deputy Coordinator if one is assigned.

Following the filing of the written complaint, the Title IX Coordinator will meet with and interview the Grievant. Subsequent to the filing of the complaint the Title IX Coordinator will also schedule an interview with the Respondent to discuss the allegations, provide a copy of the complaint and College's Title IX Policy, and discuss the complaint process in general. The Title IX Coordinator will direct the Respondent to provide a written response to the complaint. The Grievant shall be entitled to receive and review such response. The Title IX Coordinator will also interview any relevant witnesses to the allegations and may request documentation from the appropriate departments and offices at the College.

If the Respondent or any witness refuses or fails to respond to the Title IX Coordinator's request for a response to the complaint, request for information, or otherwise fails to cooperate, the Title IX Coordinator may nevertheless continue the investigation.

Within (60) days after the date of the complaint, the Title IX Coordinator will render a decision to whether, by a preponderance of the evidence, it has been determined that sex discrimination has or has not occurred. Such decision shall be supported by a written report containing findings of fact, along with a recommendation by the Title IX Coordinator of the remedial and/or disciplinary action(s) to be taken. Within five (5) days of the date of the decision, the Title IX Coordinator shall notify in writing the Grievant, the Respondent, and the President of the College of his or her decision described above.

J. Appeal of Findings of Investigation

All parties to the complaint may appeal the findings and recommendation of the Title IX Coordinator. All grounds for appeal should be based on the emergence of new evidence that was previously unavailable, on the grounds that some aspect of this policy or procedure was not adequately followed or evidence of bias on the part of the Title IX Coordinator. The methods of appeal are detailed in sections XII through XVI, page 4, of the Grievance Procedure document.

The final appeal shall be the impartial review and decision by the College President provided that he was not involved as a party or witness to the investigation, in which case the appeal shall be reviewed by the Chairman of the Board of Trustees. Any

appeal must be filed within ten (10) days of the Title IX Coordinator's decision. The President shall render a decision on the appeal within ten (10) days of receipt of the appeal.

K. <u>Determination of Disciplinary Action</u>

In the event the Title IX Coordinator finds that the Respondent has committed an act of sex discrimination as defined by this policy the matter will proceed as follows:

- 1. <u>Students</u>: If the Respondent is a College student, the Dean of Students or Title IX Coordinator will determine and administer the appropriate disciplinary action. If the College student is found to have committed sexual assault the Dean or Title IX Coordinator may initiate expulsion proceedings pursuant to the Student Handbook.
- 2. <u>Staff</u>: If the Respondent is a staff member, the Title IX Coordinator will recommend the appropriate disciplinary action to the Vice President of Finance and Operations. If a staff member is found to have committed sexual assault then his or her employment may be terminated in accordance with the Employee Handbook.
- 3. Faculty: If the Respondent is a faculty member and his or her conduct warrants discipline that is less severe than discharge or suspension, the Title IX Coordinator will recommend sanctions to the Vice President of Academic Affairs. In cases where the faculty member's actions warrant discharge or termination of employment, the Title IX Coordinator will recommend to the President that termination proceedings be initiated. If the President accepts the recommendation, the matter will proceed in accordance with the terms of the College's Faculty Handbook providing for "Dismissal for Cause."
- 4. <u>Administration</u>: If the Respondent is a member of the administration (and not the President) the matter will be referred to the President for appropriate action. If the Respondent is the President, the matter will be referred to the Chairman of the Board of Trustees for appropriate action.
- 5. <u>Trustees</u>: If the Respondent is a member of the Board of Trustees (and not the Chairman) the matter will be referred to the Chairman of the Board. If the Respondent is the Chairman of the Board, a committee of the Board of Trustees will be called by the Vice Chairman of the Board for appropriate action.

Any appeal of the Title IX Coordinator's decision and recommendation shall stay the imposition of disciplinary action under this section but only during the pendency of the appeal. If the disposition of the appeal does not alter the recommended sanction, disciplinary action pursuant to this section shall proceed.

L. <u>Complaints Initiated by Administration</u>

The College President, Vice Presidents, Deans, or supervisors may request the Title IX Coordinator investigate allegations of sex discrimination with or without the consent of the alleged victim. Such administrator requesting the investigation will act as the Grievant and must specify the person or persons responsible for exhibiting the alleged discriminatory conduct. The Title IX Coordinator will use the same notification and procedural guidelines outlined in the foregoing complain process.

VII. RETALIATION; FALSE COMPLAINTS

A. Retaliation

It is a violation of this policy to retaliate against a person making a complaint alleging a violation under this policy or against any person cooperating or participating in an investigation under this policy. Retaliation should be reported promptly to the Title IX Coordinator and may result in appropriate disciplinary action independent of other sanctions or interim measures administered under this policy.

B. Filing a False Complaint

Any Grievant who knowingly makes false charges alleging violations of this policy may be subjected to disciplinary action.

Notice Regarding Title IX Grievance Procedure

Pursuant to regulations at 34 C.F.R. §106.9, Great Lakes Christian College does not discriminate on the basis of sex in admission to or employment in its education programs or activities. Inquiries concerning the application of Title IX and its implementing regulations may be referred to the College's Title IX Coordinator or to the Office for Civil Rights of the U.S. Department of Education. This notice is also to inform you that, in keeping with the College's policy of non-discrimination, the College adopted a grievance procedure for reporting claims of sex discrimination under Title IX. The Title IX grievance procedure, which pertains to how sex discrimination grievances will be handled by the College, will be posted on the College website. A copy of the grievance procedure may be obtained from the Vice President of Finance and Operations [the College's designated Title IX Coordinator], by calling (517) 321-0242 (ext. 212), or by visiting the Vice President's office at 6211 W. Willow Hwy, Lansing, Michigan 48917. A copy is also available from the Dean of Students, by calling (517) 321-0242 (ext. 213) or by visiting the Dean's office at 6211 W. Willow Hwy, Lansing, Michigan 48917.