



University of Connecticut
Office of Diversity and Equity

**PROTECTION OF STUDENTS AND STAFF FROM DISCRIMINATION
AND HARASSMENT DURING OFF-CAMPUS EXPERIENCES**

It is necessary for students in many programs to complete practica or internships within outside organizations. Employees also may be assigned to work at external sites as a part of their job duties. The University's legal and ethical obligations to protect the civil rights of students and staff extends to those settings.

Below are policy guidelines developed in cooperation with several Deans whose students customarily complete practica with other agencies as part of their academic programs. Your cooperation in administering the guidelines is appreciated. Should you need advice or assistance, please consult with Dana McGee, Director of the Office of Diversity and Equity (860-486-2943)

I. Inclusion of University Policies in Contracts or Agreements with External Agencies.

- A. All contracts with suppliers of services must include reference to the Governor's Executive Orders 3 and 17, and specific language is required. These Executive Orders cover nondiscrimination, as does C.G.S. Section 4a-60.
- B. Other sections of the statute govern the conduct of state agencies in their normal functions.
 1. C.G.S. Section 46a-71 prohibits discrimination in the delivery of service; forbids state agencies to become parties to agreements with entities that discriminate (or fail to bar discrimination); requires state each State agency to analyze all of its operations to ascertain possible instances of noncompliance with the policy sections 46a-70 to 46a-78, inclusive, and to initiate comprehensive programs to remedy any defect found to exist; and requires every State contract or subcontract for construction on public buildings or for other public work or for goods and services to conform to the intent of Section 4a-60.
 2. C.G.S. Section 46a-75 prohibits discrimination in the provision of educational and vocational programs; require state agencies to encourage the fullest development of students' or trainees' potential, and encourage expansion of training opportunities under these programs so as to involve larger numbers of participants from those segments of the labor force where the need for upgrading levels of skills is greatest. The statutes do not require that contracts, agreements, memoranda of understanding, et cetera, include reference to B (1) & (2). We prefer to include a brief reference to these obligations to assure that the agencies with whom we deal are well informed of the University's commitment to its statutory obligations.

- C. The President's policies on nondiscrimination, affirmative action, and discriminatory harassment should be made a part of such contracts. It suffices to attach the most current versions to the agreements.

II. Internal Procedures for University Unit Entering Agreements.

- A. The school/unit should receive and review assurance that the external agency has strong nondiscrimination policies and complaint procedures.
- B. Each out-placed student should be advised of his or her civil rights, including the right to be free of racial, religious, and sexual harassment; and should be informed of the existing mechanisms for handling complaints in these areas.
- C. The Dean or Director should appoint a staff member to serve as chief contact person or advisor for, (a) reviewing civil rights policies and procedures noted in II (A) and (B) above, and (b) pursuing complaints filed as per II (D) & (E). The identity of the individual fulfilling a similar role in the external agency should be known to school officials and students.
- D. Procedures regarding handling complaints of discrimination and harassment registered by our students should be articulated and, preferably, made a part of the agreement.
- E. Complaint procedures should be formal (i.e., consistent, fair, and amenable to review) and should include the following elements:
 - 1. Publication of the appointed staff person's identity (noted in II (C) above).
 - 2. Means by which an aggrieved person may file a complaint, formal or informal, and may inform the unit of his or her desired resolution.
 - 3. Means by which the school/unit may be assured that the complaint is treated properly by the external agency. "Properly" is defined as the standard for remedies imposed in similar complaint situations filed against an internal party.
 - 4. Protection of the complainant from retaliation must be assured.
- F. Formal and informal complaints should be recorded in a manner that allows the unit to review agencies' conduct in this area prior to renegotiating agreements.
- G. ODE is to be consulted on a case-by-case basis. If an employee of the University is accused of discriminatory conduct, ODE must be apprised of the complaint. ODE may handle these complaints itself or may advise the designated representative of the school or unit.

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