



Office of the President

## **Annual Report on Institutional Integrity**

Academic Year 2013-14

AUB has in recent years developed and implemented, through a process of shared governance, unified policies and procedures to support institutional integrity in its educational programs, healthcare services, and research activities. These policies and implementing mechanisms are a key pillar of AUB's commitment to providing a safe, supportive, and non-discriminatory learning and working environment.<sup>1</sup> AUB is also committed to compliance with Title IX of the Education Amendments of 1972, which prohibits gender-based discrimination (which includes sexual harassment and sexual violence) in the University's educational and healthcare programs and activities.

An overview is provided in Section I below of key initiatives for academic year 2013-14 (AY13-14) to improve compliance and reporting under these policies. In Section II, data for the year related to reports of alleged gender-based harassment is provided, and in Section III, information for the same period is compiled related to alleged misconduct other than gender-based discrimination (including harassment) reported under AUB's 'safe reporting' mechanism.

### **I. Summary of key initiatives AY 13-14**

During the academic year 2013-14 (AY13-14), AUB took specific steps to facilitate broader reliance on and awareness of the policies and procedures related to institutional integrity and reporting of alleged misconduct.

**Transparency and reporting mechanisms:** AUB enhanced the security of its reporting mechanism for confidential and anonymous reporting in line with its "Safe Reporting Policy" that governs the reporting and investigating of possible misconduct at AUB Campus and AUBMC. Following a review in 2013 by AUB's external auditor that included the safe reporting system, the Internal Audit Office initiated development of an enhanced mechanism and process with AUB's Office of Information Technology. Launched in May 2014, the new online system uses an encrypted database with anonymous reporting capabilities, allows reports to be

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<sup>1</sup> Policies related to institutional integrity can be accessed at: <http://www.aub.edu.lb/pnp/Pages/index.aspx>

made in Arabic and English, and establishes a classification system to facilitate processing.<sup>2</sup>

**Non-discrimination, harassment, and Title IX:** The Office of the Provost also appointed a designated Title IX Coordinator in August 2013 to coordinate AUB's efforts to respond to issues of discrimination on the basis of gender and other protected characteristics. A resource page, "Non-Discrimination, Harassment, & Title IX", was published on the Provost's website to raise awareness of these issues and as a reference for the entire AUB community. The Title IX Coordinator participated in five student orientation sessions for approximately 1,760 new students in August 2014. Title IX resources and related policies were also presented in customized orientation sessions for international students, new faculty, and new staff.

**Training:** Human Resources organized three four-hour workshops during the academic year specifically focused on AUB's non-discrimination and harassment policies and procedures, on improving understanding of the surrounding issues, and on responsibilities—especially for managers—in terms of addressing allegations and suspected misconduct. **Nine** non-academic staff and **six** managers attended the workshops (disaggregated by gender: **seven** female and **eight** male).

Awareness training will be conducted in 2015, initially for the Board of Deans and then at departmental meetings to ensure the entire faculty is better sensitized to these issues and able to consistently and effectively respond to incidents reported or witnessed. Intensive training is also being planned for spring 2015 for a pool of potential evaluators/investigators, and for key administrators who would benefit from more specialized understanding of the surrounding issues and solutions.

## **II. Reported incidents of alleged gender-based discrimination received/investigated**

Formal complaints are made through the "Notice of Discrimination Harassment Form", and are addressed and evaluated by a special committee formed for each case in accordance with the "Policies Concerning Sexual and Other Discriminatory Harassment" (December 12, 2012) and the "Procedures to Address Formal Allegations of Sexual and other Discriminatory Harassment" (December 12, 2012).

Informal complaints are also systematically addressed even in the absence of a formal complaint although the ability to effectively respond and evaluate a specific case may be limited accordingly. In the case of both formal and informal complaints, disciplinary and/or other actions are taken in line with AUB policies and procedures and within the Lebanese legal and regulatory framework. If sufficient information is

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<sup>2</sup> Online form can be accessed at: <https://safereport.aub.edu.lb>

available, the incident is referred for possible action by the appropriate office or department. The incident reports help AUB develop a coordinated and effective campus response related to issues raised by these incidents.

Reported incidents of alleged gender-based discrimination (that includes sexual harassment) for AY13-14 are provided in **Table A** below. This information reflects reports of alleged harassment, which were not necessarily determined to be violations of university policy. In each case, a university official meets with the person who submits a report to provide information about informal and formal mechanisms for possible action, and referrals.

Of the **eighteen** complaints, **thirteen** were addressed through the informal complaint process and **five** through the formal process that involved an investigative committee. Of the **five** formal complaints: **three** resulted in disciplinary and/or employment sanctions, **one** allegation was determined by the committee to be unsubstantiated, and **one** case is pending. AUB investigated the remaining **thirteen** reports to the extent possible and took action in **seven** of the cases. **Five** of the cases are fully confidential and not actionable, and **one** report is under review.

**Table A. Reported incidents of gender-based harassment AY13-14**

#	INITIAL RECIPIENT OFFICE & MECHANISM		LOCATION			COMPLAINT PROCESS	
	Receiving Office	Report Intake Mechanism	AUB Campus	AUB Medical Center	Adjacent Public Property	Informal	Formal
1	Protection	Email	✓				✓
2	President	Email	✓				✓
3	Protection	Telephone + statement	✓				✓
4	Provost	Letter	✓				✓
5	Dean of Students	Email	✓			✓	
6	Student Affairs-Counselng	In person	✓			✓	
7	Student Affairs-Counselng	In person	✓			✓	
8	Student Affairs-Counselng	In person	✓			✓	
9	Student Affairs-Counselng	In person	✓			✓	
10	Student Affairs-Counselng	In person	✓			✓	
11	Student Affairs-Counselng	In person	✓			✓	
12	Protection	Reported to AUB guards		✓		✓	
13	Protection	Reported to AUB guards		✓		✓	
14	Protection	Reported to AUB guards			✓	✓	
15	AUBMC			✓		✓	
16	AUBMC			✓		✓	
17	AUBMC			✓		✓	
18	AUBMC			✓			✓
TOTAL			11	6	1	13	5

### III. Safe Reporting - Cases of alleged misconduct received/investigated

Reports of alleged misconduct can be made anonymously through the safe reporting website. Reports may also be reported orally or in writing to the university auditor, the secretary of the university, or the president, or if any of these three is the subject of the complaint, the complaint may be made to another named officer or to the chair of the audit committee or the chair of the board of trustees. Safe reports and fraud complaints will be addressed by the receiving officer or university auditor in accordance with procedures within the "Safe Reporting Policy" and "Fraud Policy" (April 13, 2011).

During AY13-14, the Internal Audit Office (IAO) received **sixteen** reports (**Table B**) including: **ten** regarding financial matters that alleged conflict of interest; theft and/or improper budgeting/reporting; **two** allegations related to human resources; **two** allegations related to academic matters; and, **two** regarding safety and security. Thirteen of the reports concerned the AUB Campus and three concerned the AUB Medical Center. The IAO also carried forward **two** financial matters from 2013 that were referred to operational management for control and improvements.

**Table B. Safe reports AY 13-14 alleged misconduct**

Category	Received	Completed	In progress	Pending
Financial	10	6	2	2
HR	2	1	1	0
Academic	2	1	1	0
Safety	2	1	0	1
	16	9	4	3

Of the completed reports, two reports had no identifiable basis and three concerned minor issues. The remaining four completed reports are among the six reports below:

#### Financial category

1. Report regarding cash mishandling resulted in a formal investigating committee and a termination of employment.
2. Report resulted in an extensive investigation, which separated ongoing processes (referred to operational management for action) from allegations of impropriety (investigated by IAO). Documentation showing proper procedures and authority was found. No evidence of impropriety was found. Internal control and communication improvements were recommended and are being implemented.
3. Report and preliminary assessment resulted in an audit that is in progress at the time of this report (October 2014).

#### Academic category

4. Report regarding access to exams was referred to management and to the academic committee already charged with reviewing such issues. The review found no evidence supporting the specific allegations and found credible alternative explanations for the outcomes.
5. Report alleging that an impostor took a competency test for an AUB job applicant was found to be true. Improvements in internal control, including improved supervision and review, have been recommended and are being implemented. Some outstanding questions remain, the resolutions of which are in progress.

#### Safety category

6. Report submitted under the category of safety raised concerns about the quality of water at AUB and whether it is tested. The outcome was more frequent periodic testing, confirmation of chlorination to address biological matter, and like most piped water in Beirut this summer, confirmation of the poor taste of water with high total dissolved solids.

#### **IV. Conclusion**

In addition to the awareness training planned for 2015 as noted in Section II above, AUB plans to conduct a campus climate survey for students in spring semester 2015 to assess both the prevalence of sexual or other discriminatory harassment and perceptions of campus climate. These surveys, widely considered a best practice in responding to campus discrimination and harassment, offer critical data to universities in designing and implementing response, intervention, and prevention strategies.