**Safe and Inclusive Working Environments for Off-Campus or Off-Site Research**

**POLICY**

**Updated August 25. 2023**

Valparaiso University shall comply with the NSF requirements for assuring Safe and Inclusive Working Environments for Off-Campus or Off-Site Research. In general, this policy relies on existing related University policies, processes, and resources. Special considerations regarding the “off-campus or off-site” nature of the grant-funded work are outlined below.

**Definition of Off-Campus/Off-Site for Research/Work Environments**

For the purposes of complying with the NSF policy, Valparaiso University’s definition of “Off-Campus/Off-Site” regarding the location of research or work is as follows:

* For **in-person** research or work, off-campus/off-site is defined as any research or work that is done outside of the borders of the University’s physical campus.
  + For property and buildings that the University owns or rents close to the main campus, the space/streets used to reach these locations are considered on-campus (examples: the path to reach the iHub, the streets used to reach West Campus) as are those buildings.
  + Fraternities and sororities are considered on-campus.
* For **on-line/virtual** research and work, the session/event is considered
  + **On-campus** if the session/event originated from a Valparaiso University account or was planned, initiated, or coordinated by University personnel.
  + **Off-campus** if the session/event originates from a non-University account, was planned, initiated, or coordinated by non-University personnel or organizations.
* NSF-funded **conferences** and related travel hosted/organized by Valparaiso University are considered on-campus activities regardless of location or meeting modality. Incidents involving the safety and inclusion of any workers or attendees of such events will be treated according to Valparaiso University policy.

**Reporting Requirements/Resolution Resources**

This policy covers a wide range of possible situations involving harassment and exclusion and assumes a typical research team consisting of one or more faculty and one or more students. The following list of possible situations and resolutions is illustrative rather than comprehensive or prescriptive. Involved parties and team members may exercise judgment in addressing a situation in a way that is in keeping with the requirements and spirit of existing policies, regulations, and laws.

1. If the situation involves only Valpo students, students may seek assistance from the Principal Investigator/Project Director (PI/PD). The PI/PD will lead them in addressing the situation and/or guide the students through Valpo’s established processes.
2. If the situation involves the PI/PD or if the student feels uncomfortable going to them, the student may reach out to other Valpo resources as described in Valpo policies or to officials at the off-campus/location.
3. If the situation involves both Valpo and host organization personnel, follow the policies of each institution as appropriate.
4. For situations that may escalate (one party is mentally ill, intoxicated, or behaving in a way that suggests a possibility of violence), any team member may contact local authorities for assistance with de-escalating the immediate situation. Then, the PI/PD or another team member will address the situation via Valpo policies and/or local policies, as appropriate. Personnel from the host institution may also be involved, as appropriate.
5. For extreme situations (stalking, assault), any team member or personnel from the host institution may contact local authorities and the PI/PD or another team member will report the situation to Valpo per Valpo policies.

**Developing a Grant-Specific Plan**

Chapter II.E.9, Safe and Inclusive Working Environments for Off-Campus or Off-Site Research *(Proposal & Award Policies & Procedures Guide* (PAPPG) (NSF 23-1) effective January 30, 2023), describes the requirement for the AOR to certify that an organization has a plan in place for safe and inclusive research for any grant proposal that involves off-campus or off-site research. This section also provides considerations for plan development, communication, and dissemination.

* PIs/PDs should use the Grant-Specific Plan Template to develop a project-specific plan.
* The Plan must be included in the GPAF internal routing packet prior to grant submission.
* If the project is funded by NSF, this plan must be shared with all team members and team members must be trained regarding the plan. Documentation of team member training is part of the plan.

**Dissemination of Policy and Resources**

This policy will be posted on the Office of Sponsored and Student Research website. The Director of the Office of Sponsored and Student Research will provide guidance regarding the policy and completing the plan template. The Legal, Human Resources, Student Life, Campus Recreation and Well-Being, DEI, Title IX, Police Department, and other University offices and departments may be consulted as needed.

The PI/PD is responsible for training team members on the grant-specific plan, documenting the training, and providing each team member with a copy of the plan. Such training will be conducted by or coordinated with other campus training sessions when appropriate and feasible.

**Safe and Inclusive Working Environments for Off-Campus or Off-Site Research**

**BACKGROUND**

**Updated August 25. 2023**

**Description of the NSF Requirement**

In the *Proposal & Award Policies & Procedures Guide* (PAPPG) (NSF 23-1) effective January 30, 2023, the NSF requires that grant applicants foster safe and harassment-free environments wherever science is conducted, including research conducted off-campus or off-site. The PAPPG states:

It is NSF policy (Chapter XI.A.1.g.) to foster safe and harassment-free environments wherever science is conducted. NSF’s policy recognizes that a community effort is essential to eliminate sexual and other forms of harassment in science and to build inclusive scientific climates where people can learn, grow, and thrive. Accordingly, for each proposal that proposes to conduct research off-campus or off site44, the AOR must complete a certification45 that the organization has a plan in place for that proposal that describes how the following types of behavior will be addressed:

a. Abuse of any person, including, but not limited to, harassment, stalking, bullying, or hazing of any kind, whether the behavior is carried out verbally, physically, electronically, or in written form; or

b. Conduct that is unwelcome, offensive, indecent, obscene, or disorderly.

This plan should also identify steps the PI/proposing organization will take to nurture an inclusive off-campus or off-site working environment, e.g., trainings; processes to establish shared team definitions of roles, responsibilities, and culture, e.g., codes of conduct; and field support, such as mentor/mentee support mechanisms, regular check-ins, and/or developmental events.

Communications within the team and organization should be considered in the plan, minimizing singular points within the communications pathway (e.g., a single person overseeing access to a single satellite phone), and any special circumstances such as the involvement of multiple organizations or the presence of third parties in the working environment should be taken into account. The process or method for making incident reports as well as how any reports received will be resolved should also be accounted for. The organization’s plan for the proposal must be disseminated to individuals participating in the off-campus or off-site research prior to departure. Proposers should not submit the plan to NSF for review unless directed to do so.

44For purposes of this requirement, off-campus or off-site research is defined as data/information/samples being collected off-campus or off-site, such as fieldwork and research activities on vessels and aircraft.

45 See also Chapter II.D.1.d(viii).

**Existing University Policies**

Valparaiso University has several policies regarding safety and harassment-free environments, including:

1. **Valparaiso University Personal Pronoun Policy**, Approved by President’s Cabinet: February 14, 2022

This policy is specific to “students and employees” of the University.

1. **Nondiscrimination Policy: Notice of Nondiscrimination, Reporting Procedures, and Complaint Process**, Approved by President’s Council 3.5.11, Revised: 6.30.15; 5.10.16; 6.17.16; 3.6.18; 08.12.20; 11.09.21

It is the policy of Valparaiso University that no person shall on the grounds of race, color, age, sex, gender identity, sexual orientation, pregnancy, disability, veteran status, religion,1 national and ethnic origin, veteran status, or genetic information be excluded from participation in, be denied the benefits of, or be subjected to discrimination in employment or in any educational program or activity of the University. To that end, and in compliance with federal and state laws, the University prohibits any member of the faculty, staff, administration, student body, or visitors to campus, whether they are guests, patrons, independent contractors, or clients, from discriminating against any other such person or member of the University community in violation of this Policy.

Valparaiso University also prohibits harassment, and may consider it a form of discrimination, as set forth above, if it is unwelcome and sufficiently severe or pervasive so as to substantially interfere with a person’s work, education, participation in a University activity, or purpose for being on campus, or is otherwise considered discrimination in violation of the law. Harassment prohibited by this Policy may include, but is not limited to, threats, physical contact, violence, pranks, jokes, slurs, epithets, derogatory comments, vandalism, or verbal, graphic, or written conduct directed at an individual or individuals. Even if actions are not directed at specific persons, a hostile environment may be created when the conduct is sufficiently severe, pervasive or persistent so as to unreasonably interfere with or limit the ability of an individual to work, study, participate in activities of the university, or achieve their purpose for being on campus. Furthermore, off campus incidents or incidents at non-University activities may be considered when determining the severity, pervasiveness, or persistence of the conduct that gives rise to hostility or harassment.

1. **Harassment and Sexual Misconduct Policy: Notice of Nondiscrimination, Reporting Procedures, and Complaint Process**, Approved by President’s Council 3.5.11, Revised: 6.30.15; 5.10.16; 6.17.16; 3.6.18; 08.12.20; 09.30.21

It is the policy of Valparaiso University that no person shall on the grounds of sex, gender identity, pregnancy, or sexual orientation be excluded from participation in, be denied the benefits of, or be subjected to discrimination in employment or in any educational program or activity of the University. To that end, and in compliance with federal and state laws, the University prohibits any member of the faculty, staff, administration, student body, or visitors to campus, whether they are guests, patrons, independent contractors, or clients, from discriminating against any other such person or member of the University community in violation of this Policy.

**Existing Valparaiso University Trainings (As of April 2023)**

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| **Topic** | **VU Office/Department** | **Contact Person** |
| Sexual and other types of harassment | Campus Recreation and Well-Being | Assistant Director of Prevention and Wellness, Natalie Muskin-Press |
| Racially/ethnically based slurs | DEI | Assistant VP for DEI, Angela Vidal-Rodriguez |
| Bullying | Title IX office (Human Resources)  Campus Recreation and Well-Being | Executive Director of Human Resources, Deondra Devitt  Assistant Director of Prevention and Wellness, Natalie Muskin-Press |
| Hazing | Center for Student Involvement | Director, Student Involvement & New Student Programs, Ryan Bye |
| Stalking, assault | Title IX office (Human Resources)  VU Police Department | Executive Director of Human Resources, Deondra Devitt  Chief, VUPD, Chuck Garber |