

Year 1 Public Description of Work for
Action Collaborative on Preventing Sexual Harassment in Higher Education

University of Wisconsin System
Internal Audit UW System Audit on the
Handling of Reports of Sexual Misconduct

This Action Applies to Rubric Item(s):

15, 22, and 27

Description of Work:

The UW System Office of Compliance and Integrity collaborated with the UW System Office of Internal Audit to conduct an internal audit of Discrimination, Harassment and Retaliation at all UW System institutions. The internal audit focused on the process for administering and documenting Title IX complaints for both students and employees, with an emphasis on compliance with applicable policies, laws, and regulations. The internal audit also followed-up on the recommendations of the UW System President's Sexual Violence and Harassment Priorities Working Group presented in February 2019, which encompassed ways to move beyond compliance. In addition, the internal audit aided the Office of Compliance and Integrity in identifying opportunities to move beyond compliance by identifying best practices for not only addressing incidents, but also ways to improve institutional climate in this area. The internal audit reviewed the condition at UW System institutions from July 1, 2018 through June 30, 2019. The internal audit findings were reported in fall of 2019.

The UW System Office of Internal Audit's process is as follows: notification, preliminary planning and research, entrance conference, fieldwork, draft observations and recommendations, exit conference, final audit report, and follow-up on recommendations. The Office of Compliance and Integrity collaborated with the Office of Internal Audit on this audit by working with the audit team on questions, issues, and follow-up during their work. In addition, the Office of Compliance and Integrity served as a resource to the UW System institutions as they went through the audit process. UW System and UW institutions were able to provide feedback and respond to questions or potential areas of opportunity to improve response mechanisms as well as overall climate that presented themselves during the process. In thinking about and reviewing response mechanisms, it became clear that there were ways to address the handling of incidents that could aid institutions in improving climate on campus. There is no doubt that creating responsive systems sends a message not only to those experiencing incidents of sexual harassment, but also to the entire community.

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The purpose and goal of the internal audit was to provide an overall understanding and identify areas of opportunity for the UW System as well as its institutions in addressing Title IX complaints and related issues on campus. The UW System has already used and will continue to use the information garnered from the audit to mold our current work as well as future initiatives in this area. To that end, there is not a fixed implementation date for the majority of the data garnered in the audit. The internal audit has provided insight into the work we are beginning to undertake and future response protocols and policies.

This internal audit was new for the UW System in the way that it looked at how the UW System was collectively responding to complaints as well as addressing the recommendations from the System working group. This type of audit is relatively new for higher education and from this experience the UW System has a better understanding of where our response is and where we can go in the future. The results are currently being used to discuss various opportunities to improve overall system response.

The Internal Audit UW System Audit on the handling of reports of sexual misconduct is in line with the 2018 NASEM report. In particular, the internal audit improved communication from the campuses to the System and the System to the campuses as well as increased transparency. Efforts, like the internal audit, only support the System's message that reports of sexual harassment are taken seriously and reinforce that the System is committed to addressing sexual harassment and sexual violence on campus. The internal audit also fits in the 2018 NASEM report as a strategy that remediates the harm of sexual harassment and supports those that experience sexual harassment by reviewing response mechanisms and the way complaints are managed by its institutions. The internal audit also serves as another method to utilize in monitoring climate and response on an ongoing basis.

The next steps are to continue to use the data garnered from the internal audit in our future work on addressing our institutions' response to sexual harassment and sexual violence on campus.

Website for further information (if applicable): Not applicable

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