

Ross University School of Medicine



ROSS UNIVERSITY
SCHOOL OF MEDICINE

2023-2024 Annual Disclosure
Student Right-to-Know and Campus Security (Clery Act)
Annual Security Report
Annual Fire Safety Report
Sex and Gender Based Misconduct Response and Prevention Policy
Alcohol & Substance Abuse Policy
Student Rights under FERPA
(The Family Educational Rights and Privacy Act)

This document includes information for:

**Ross University School of Medicine, Barbados Campus, 2 mile Hill, St.
Michael, Barbados**

September 22, 2023

The policies outlined in this document are current as of September 22, 2023. The most current versions of the policies are available online.

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CAMPUS WATCH

It's your campus - Protect it!

A truly safe campus can only be achieved through the cooperation of students, faculty and staff. As a member of the Ross University School of Medicine (RUSM) community, it is your responsibility to report a crime, suspicious activity or other emergencies on campus to the appropriate school official. Should you become a witness to or victim of a crime, immediately report the incident to local law enforcement officials, the Student Services office, or to the Manager of Safety and Security. All crimes will be investigated and when appropriate, brought to the attention of the Student Services office for disciplinary hearings.

Purpose of the Annual Disclosure Report

RUSM prepares this report to comply with the *Jeanne Clery Disclosure of Campus Security and Crime Statistics Act*. The full text of this document can also be found on the <https://medical.rossu.edu/student-consumer-information.html> or by visiting either of your local Security and Safety offices at Lloyd Erskine Sandiford Centre or Coverley. This report was prepared with the assistance of local law enforcement agencies. Campus crime, arrest and referral statistics include those that were reported to local law enforcement and campus faculty and staff. This data may also include crimes that have occurred in private residences or businesses adjacent to the campus.

REPORTING CRIMES AND EMERGENCIES

When making your report of an incident you will be asked to provide the following information:

1. Description of the incident
2. Date, time and location of the incident
3. Description of the persons or vehicles involved in the incident
4. Detail regarding who was notified about the incident

Upon receipt of this report RUSM will determine the appropriate response, which could include disciplinary action against the offender(s), notification to local law enforcement, notification to the campus community or other public safety alternatives deemed appropriate given the circumstances. Please note that your identity may not be confidential when reporting an incident. RUSM does not have procedures for voluntary, confidential reporting of crimes.

Once each semester, RUSM will contact the Barbados Police Service and property management to monitor and record crimes that occur within the designated area surrounding the campus that have been reported to the local Police.

For Emergencies –Dial 211 (Police); 311 (Fire Services); 511 (Ambulance services)

ANNUAL SECURITY REPORT

RUSM will, without delay, and taking into account the safety of the community, determine the content of the notification and initiate the SIREN notification system, unless issuing a notification will, in the professional judgment of responsible authorities, compromise efforts to assist a victim or to contain, respond to, or otherwise mitigate the emergency.

The Manager of Safety and Security will determine if there is a significant emergency or dangerous situation and what segment of the campus community will need to receive a notification.

RUSM will:

- Test emergency response and evacuation procedures on an annual basis
- Document each test, including the date, time, and whether it was announced or unannounced
- Publicize emergency response and evacuation procedures in conjunction with at least one test per calendar year

SIREN EMERGENCY ALERT SYSTEM

In the event of an emergency or a potentially dangerous threat to the campus or center arises, students, faculty and staff will receive timely notification via the SIREN system, on campus flyers, and/or email announcements. This includes any Clery Act crimes that are reported to the campus IC or local police and are considered to represent a serious or continuing threat to students, faculty, and staff. Please make sure to keep contact information updated in SIREN through the student portal at <https://medcommunity.rossu.edu> for students and the Adtalem Global Education Commons at <https://atge.okta.com/app/UserHome> for faculty and staff.

Area Police/Fire Non-Emergency Numbers:

<u>County/City</u>	<u>Police</u>	<u>Fire</u>
2 Mile Hill (LESC)	1-246-430-7242	1-246-535-7825 (Bridgetown)
Coverley	1-246-430-7625	1-246-535-7824 (Rendezvous hill)

CAMPUS ACCESS, FACILITY SECURITY AND LAW ENFORCEMENT

RUSM, Barbados Campus

The Facilities department maintains the building and grounds with a concern for safety and security. Facilities staff inspect the facility regularly, promptly make repairs affecting safety and security hazards, and respond to reports of potential safety and security hazards such as broken windows, locks, etc. Students, faculty and staff can assist the Facilities staff by calling security at 1-246-627-8001/8011 to report concerns, security will then contact the landlord at Coverley or LESC to respond and effect the repairs. Additionally, the Facilities Manager routinely inspects the grounds and building to review lighting and other environmental concerns for safety.

There are fire alarms and pull stations throughout the facility that should be used only in the event of an emergency. If an emergency requires evacuation, there are signs clearly posted throughout the building indicating the best routes for evacuation.

The building is generally open from 6 a.m. to 2 a.m. Monday to Friday, including weekends. When the building is closed, it is locked and monitored by a security company. Access to classrooms and laboratories is limited to those enrolled in the courses meeting there. Access to on- and off-campus activities is limited to actively enrolled students and their guests. Students are responsible for the behavior of their guests at all times at campus-arranged events. RUSM reserves the right to require that RUSM identification cards be presented for admittance to certain locations and events. RUSM may also require students to register their guests with Student Services prior to attendance. Student, faculty and staff identification cards should be worn at all times. Due to state specific COVID-19 guidelines, please reach out to the campus directly for updated times in which the building is open.

The on-duty security Officers serve as escorts and on campus security seven days a week, 24 hours a day. The uniformed Officers must be called to respond to emergencies and can be contacted at 1-246-627-8001/8011. The security officer has the authority to ask questions and request identification at any time. Criminal incidents will be referred to local law enforcement.

All crime victims and witnesses are strongly encouraged to report incidents to both campus security and local police. Prompt reporting will ensure timely warning notices to the campus community and timely disclosure of crime statistics.

Students living in off-campus student housing facilities should check with the apartment landlord for specific safety and security measures at their complex. Although most complexes provide keys for individuals and restrict access to apartments, the level of additional security varies from complex to complex. Crimes committed at off-campus housing should be immediately reported to the Police department with jurisdiction over the complex and as soon as reasonably possible to the Student Services office.

The campus security department maintains a policy concerning the monitoring and recording, through local police departments, of criminal activity in which students engaged at off-campus locations of student organizations officially recognized by the institution, including student organizations with off-campus housing facilities.

MISSING STUDENT POLICY

To report a student missing, please contact Campus Security. An official missing student report will be referred immediately to the campus security department, or in the absence of a campus security department, to the local law enforcement agency that has jurisdiction in the area.

Students living in an on-campus housing facility may identify a contact person(s) who will be notified if the student is determined missing by the campus security department or the local law enforcement agency. Contact information will be confidential, accessible only to authorized campus officials and law enforcement, and may not be disclosed outside of a missing person investigation. The Missing Student Designated Contact form is available at the Student Affairs Department.

If a student is under the age of 18 and not emancipated, RUSM must notify a custodial parent or guardian when the student is missing, in addition to any contact person designated by the student. The local law enforcement agency will be notified when a student is reported missing, unless the local law enforcement agency was the entity that made the determination that a student is missing.

MISSING STUDENT PROCEDURES

When a student residing in an on-campus student housing facility is determined to have been missing for 24 hours, RUSM will:

- Notify student's designated contact person within 24 hours;
- If the student is under 18 years of age and is not emancipated, notify the student's custodial parent or guardian and any other designated contact person within 24 hours; and
- Inform the local law enforcement agency that the student is missing within 24 hours.

SAFETY AND SECURITY

Campus safety and security is the shared responsibility of students, faculty and staff. To enhance student, faculty and staff awareness of their responsibility for personal safety, various information and services, including but not limited to, the following are provided throughout the year:

- Pamphlets on personal safety
- Emergency safety information
- Optional renters insurance information for housing students
- Safety/security displays in the library and/or student services office
- Use of institution publications as a forum for personal safety topics
- Institution housing inspections to consider security precautions
- Escort services provided by on-duty security officer

Safety and Security Tips

Personal

- Stay alert and tuned in to your surroundings.
- Communicate that you are calm, confident and know where you are going.
- Stay away from isolated areas.
- Stay on the part of sidewalks furthest away from shrubs, dark doorways and alleys.
- Walk with a companion whenever possible.
- Check the back seat before getting into a car. Keep doors locked while driving.
- Don't overload yourself with packages or wear shoes or clothing that restricts movement.
- Avoid displaying large amounts of cash or jewelry.
- Carry a purse close to your body. Carry a wallet in an inside coat or front trouser pocket.
- If you think someone is following you, abruptly switch directions and walk toward an open store, restaurant or lighted home.
- Don't hitchhike or pick up hitchhikers.
- Park in well-lighted areas.

- Avoid isolated bus stops at times when few other people are around.
- Do not reveal your name, phone number or address to strangers.
- Never admit that you are alone or that you will be away from home.
- Keep an eye on neighbors' homes or apartments while they are away and have them do the same for you.
- Keep your local police department's phone number next to your phone.

Residence

- Keep doors locked at all times
- Draw shades and curtains whether or not you are at home
- Keep money and jewelry locked in a safe place
- Leave a light on while you are away or use a timer
- Secure sliding glass doors with commercially available locks or a rigid wooden dowel in the track
- Don't hide spare keys in mailboxes, planters or under doormats
- Make a record of your valuables and keep it in a safe spot
- Don't leave a note that says you are not in
- Never prop doors open
- Keep ladders and tools in a locked area
- Have someone cut your lawn while you're on vacation

Vehicle

- Always lock your car and remove the keys. Make sure the windows are closed.
- Lock all valuables in the trunk
- Never leave an ID tag on your key ring
- Leave only the ignition key with parking attendants
- Park in well-lit areas

Office

- Keep your purse, wallet and other valuable items with you at all times or locked in a drawer or closet
- Never leave keys lying out
- Never leave change or cash on the desk or in a top drawer
- Notify security personnel of any suspicious persons or vehicles
- Lock doors when working after normal hours
- Report any broken or flickering lights, and doors that don't lock properly

CAMPUS CRIME STATISTICS ARE INCLUDED AT THE END OF THIS DOCUMENT.

FIRE SAFETY

Ross University School of Medicine

The fire safety system used for RUSM's off-campus housing facility includes:

- Dorm rooms are on the ground floor level in all buildings. A total 408 houses of which 163 has front door only and 245 with front and back doors.
- Fire extinguishers are accessible in each room.
- All rooms are equipped with smoke detectors with indicators for battery life.
- Fire hydrants are located in close proximity to the dormitory buildings.
- The housing department, in collaboration with security conducts fire drills three times a year to ensure that students and colleagues are familiar with evacuation procedures in the event of a fire.
- As part of the student's contract with RUSM, students agree to the following conditions for staying in campus housing:
 - Students are not to keep or have any article that is dangerous, flammable, or explosive in character or might substantially increase the danger of fire on the premises, or be considered hazardous by a responsible insurance company provided that this covenant shall not apply to cooking gas maintained in cylinders of good condition in or about the kitchen area of the premises.

- No Smoking signs are posted in each student dormitory/room and are reviewed every semester for incoming students. Zone maintenance departments conduct monthly checks for pressure of the fire extinguishers and to activate lock-out tag-out procedures.
- Campus Safety and Security monitors non-smoking of students, faculty, guests and stakeholders on an ongoing basis on University Housing grounds.

Policies regarding fire safety education and training programs provided to students, faculty, and staff describe the procedures that students and colleagues should follow in the case of a fire.

Students and colleagues must report fire occurrences to:

- On duty Security Team Leads and security officers at 627-8001 (LESC) or 627-8011 (Coverley)
- Basil M Harriott, Manager of Safety and Security, at 267-0649
- University Housing – Leah Gibson, at 235-8659
- Mr. Hazarie Ramoutar, Senior Director, Campus Operations at 231-8330
- Barbados Fire Department in Bridgetown at 535-7825 or Rendezvous Hill at 535-7824
- Dale Dangleben, Campus Facility Manager, at 253-4847
- Kevin Thomas, Maintenance coordinator (Coverley), at 289-6088
- Bryan Hayse, Associate Dean Medical Sciences and Student Affairs at 231-4129

On-going Fire Safety

The Electrical Department conducts ongoing preventive maintenance of all electrical systems in each room to verify electrical wiring, transformers, smoke detectors, switch plates and electrical receptacles and voltage readings are working appropriately.

- Zone Maintenance will conduct inspection of fire extinguishers on a monthly basis for pressure through the reading of the pressure.

In addition, Fire Prevention and Safety at RUSM Housing is included in the security presentation to incoming students.

The annual fire safety report instance documentation and log of fire safety policy updates are maintained by the Department of Safety and Security.

CAMPUS FIRE SAFETY REPORTING AND STATISTICS ARE INCLUDED AT THE END OF THIS DOCUMENT.

SEX & GENDER-BASED MISCONDUCT RESPONSE & PREVENTION POLICY

POLICY STATEMENT

Ross University School of Medicine (“RUSM”) is committed to providing a work and educational environment free of unlawful harassment, discrimination, and retaliation. RUSM expressly prohibits sex and/or gender-based misconduct, which includes sexual harassment, sex discrimination, sexual assault, rape, domestic violence, dating violence, stalking, sexual exploitation and gender-based harassment. Any acts that meet this Policy’s definitions of sex and/or gender-based misconduct are a violation of RUSM’s Policy. RUSM is committed to fostering an environment where any alleged violation of this Policy is promptly reported, and complaints are resolved in a fair and timely manner. Creating a safe environment is the responsibility of all members of the community. Regardless of the definitions provided below, anyone who believes they are a victim of sex and/or gender-based misconduct should report the incident as soon as possible to the Sexual Misconduct Response Coordinator (See “Definitions” section below for contact information) or the campus complaint administrator in addition to seeking immediate medical and/or safety assistance.

This Policy applies to complaints or reports of alleged sex and/or gender-based misconduct. RUSM states that no student or employee should be denied equal access to educational programs or activities on the basis of sex or gender, regardless of geographic location. Accordingly, RUSM has adopted this institutional Policy to ensure that students and employees are protected even when they are located outside of the United States.

RUSM reserves the right to make changes to this policy as necessary, and once those changes are posted online, they are in effect. If laws, regulations or court decisions change requirements in a way that affects this policy, the policy will be construed to comply with the most recent laws, regulations or holdings.

SCOPE

This Policy applies to all members of the RUSM community, and includes but is not exclusive to faculty, staff, students, visitors, volunteers, vendors and persons related to, receiving or seeking to receive services, or otherwise pursuing studies with the organization. It also applies, as appropriate, to any alleged act of sex and/or gender-based misconduct that adversely impacts the RUSM community, whether those acts occur on or off campus.

KEY DEFINITIONS

“Affirmative Consent” is the affirmative, knowing, conscious, voluntary and mutual agreement to engage in sexual activity. Consent can only exist free from intimidation, force, threat of force or coercion. Under this Policy, “No” always means “No” and “Yes” may not always mean “Yes.” Anything but voluntary, conscious, affirmative consent to any sexual activity is equivalent to “no” for purposes of this Policy. It is the responsibility of each person involved in the sexual activity to ensure that he or she has the affirmative consent of the other or others to engage in the sexual activity. Affirmative consent must be ongoing throughout a sexual activity and can be revoked at any time. While the legal definition of consent is found in the RUSM’s Annual Disclosure, the following general rules apply when assessing whether consent has been/was given.

- Consent can never be assumed.
- The lack of protest or resistance does not constitute consent, nor does silence.
- Where there is use of threat, force or restraint by the Respondent, the lack of verbal or physical resistance or the submission by the victim does not constitute consent.
- The manner of dress of the victim does not constitute consent.
- The existence of a dating relationship between the persons involved or the fact of past sexual relations between them should never, by itself, be assumed to be an indicator of consent.
- Consent to sexual activity with one person does not constitute consent to sexual activity with another person.
- A person who initially consents to sexual contact, including penetration, may withdraw continued consent at any time during the course of that interaction. When consent is withdrawn or can no longer be given, engagement in sexual activity must stop.
- Consent to some form of sexual activity cannot automatically be taken as consent to any other form of sexual activity.
- A person cannot consent to sexual activity if that person is unable to understand the nature of the activity or give knowing consent due to circumstances, including without limitation the following: the person is incapacitated due to use or influence of alcohol or drugs; the person is asleep or unconscious; the person is under age, or the person is incapacitated due to a mental disability.
- Consent is required regardless of whether the person initiating sexual activity is under the influence of drugs and/or alcohol.

- A power differential between people engaged in a sexual act presumes the inability to consent for the less powerful person (e.g., the student in a student-colleague interaction; the supervisee in a direct report-supervisor interaction).
- It is not a valid excuse to alleged lack of affirmative consent that the Respondent believed the victim consented to sexual activity if the:
 - Respondent's belief arose from the Respondent's own intoxication or recklessness
 - Respondent did not take reasonable steps to ascertain whether the Complainant affirmatively consented
 - Respondent knew or a reasonable person should have known that the Complainant was unable to consent because the Complainant was asleep, unconscious, incapacitated due to the influence of drugs, alcohol or medication, or was unable to communicate due to a mental or physical condition.

“Colleague” an employee of Ross University School of Medicine.

“Colleague Code of Conduct” refers to the “Adtalem Code of Conduct and Ethics” (https://www.adtalem.com/sites/g/files/krcnk321/files/migrations/media/Code%20of%20Conduct_English%20and%20Portuguese.pdf), which is applicable to colleagues at all Adtalem Global Education institutions and offices and outlines colleagues' rights and responsibilities.

“Colleague complaint procedure” is the vehicle by which colleagues can bring to the administration's attention any complaint relating to their experience with RUSM or a member of the RUSM community. It is the mechanism for investigating and trying to resolve complaints raised by colleagues and can be found in the Commons (apps.adtalem.com > **Commons- HR Portal > Policy Central**).

“Complainant” an individual who is alleged to be the victim of conduct that could constitute sex and/or gender-based misconduct.

“CRC” refers to the Coaching Resource Center, which is available to managers to assist in addressing colleague relations concerns, including complaints about colleague or vendor conduct.

“Dating Violence” means violence committed by a person (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship; the type of relationship; and, the frequency of interaction between the persons involved in the relationship.

“Decision-Maker” panel of no fewer than three (3) member who will facilitate the live hearing and determine if a violation of this Policy occurred.

“Domestic Violence” includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws of the jurisdiction.

“Formal Complaint” is a document (hardcopy or electronic) filed by a Complainant or signed by the Sexual Misconduct Response Coordinator alleging Sexual Harassment against a Respondent and requesting that RUSM investigate. A Formal Complaint must be signed (physical or digital) by the Complainant, the Sexual

Misconduct Response Coordinator, or otherwise indicate that the Complainant is the person filing the Formal Complaint. At the time of filing a Formal Complaint, the Complainant must be participating in or attempting to participate in RUSM's education Program or Activity with which the Formal Complaint is filed.

“Gender-based Misconduct” refers to unwelcome conduct, including harassment, of an unacceptable nature based on actual or perceived biological sex, including behaviors based on gender identity, expression and nonconformity with gender stereotypes.

“Mandatory Reporter” is an employee who must report all instances of Sexual Harassment to the Sexual Misconduct Response Coordinator. All employees are Mandatory Reporters.

“Member of the RUSM community” includes students, faculty members or staff and any other individuals associated with Ross University School of Medicine. The conduct administrator or complaint administrator shall determine a person's status in a particular situation.

“Notice” refers to any information regardless of whether it is direct, indirect, partial or complete received by a colleague that indicates possible sex or gender-based misconduct. When notice is received, colleagues are required to inform the Sexual Misconduct Response Coordinator or their supervisor who, in turn, must make a report to the Sexual Misconduct Response Coordinator.

“One-up manager” is a colleague's manager's manager. It is the person responsible for receiving a colleague's complaint when his/her direct manager is implicated in that complaint.

“Program or Activity” is an on or off campus locations, events, or circumstances over which RUSM exercises substantial control over both the Respondent and the context in which the Sexual Harassment occurred.

“Rape” is any penetration, no matter how slight, of the vagina or anus with any body part or object or oral penetration by a sex organ of another person, without the affirmative consent of the victim and/or by force. Rape may involve strangers or a non-stranger (e.g., friend, classmate, relative, spouse or co-worker). In these instances, rape is often referred to as “acquaintance rape.” Rape is a crime regardless of a relationship or lack thereof between individuals.

“Respondent” an individual who has been reported to be the perpetrator of conduct that could constitute sex and/or gender-based misconduct.

“Sexual Assault¹” means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation.

“Sexual Contact” means the deliberate touching of a person's intimate body parts (including lips, genitalia, groin, breast, buttocks or clothing covering any of those areas), or using force to cause self-touching by another person of intimate body parts.

“Sexual Exploitation” occurs when a person takes non-consensual or abusive sexual advantage of another for the advantage or benefit of themselves or any other person that is not the person being exploited by the behaviors. Examples include but are not limited to: invasion of sexual privacy; prostitution; non-consensual

¹ The FBI's Uniform Crime Reporting Program (FBI UCR) includes forcible and nonforcible sex offenses such as rape, fondling, and statutory rape, which contain elements of “without the consent of the victim.”

recording of nudity or sexual activity; voyeurism; knowingly exposing someone to an STI, STD or HIV; intentional exposure of genitals in non-consensual circumstances and sex-based stalking or bullying.

“Sexual Harassment” is conduct on the basis of sex that satisfied one or more of the following:

1. A RUSM colleague (employee) conditioning educational benefits or participation on an individual’s participation in unwelcome sexual conduct (i.e. quid pro quo);
2. Unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to RUSM’s education program or activity; or
3. Sexual Assault, Dating Violence, Domestic Violence or Stalking.

“Sex and Gender-based Misconduct” is a broad term used to refer to all conduct prohibited by this Policy. This encompasses sexual harassment, gender-based harassment, dating violence, domestic violence, rape, sexual assault, sexual exploitation and stalking that fall outside of RUSM’s Title IX policy. Sex and gender-based misconduct can occur between strangers or non-strangers, including people involved in an intimate or sexual relationship. Sex and gender-based misconduct can be committed by any person regardless of sex, gender or sexual orientation of the victim or perpetrator.

“Sexual Misconduct Response Coordinator” is Kelsey Bowen, Student Affairs Coordinator, titleixcoordinator@rossu.edu or 754.208.4774) for overseeing compliance with all aspects of this Policy and designated to receive and monitor resolution for all sexual misconduct reports.

“Stalking” means engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

“Code of Conduct applicable to students” refers to the policy titles “Student Code of Conduct,” which is accessible in the student handbook. It outlines students’ rights and responsibilities, as well as the process by which action may be taken against a student for Code violations.

“Student complaint procedure” is the vehicle by which students can bring to RUSM’s attention any complaint relating to their experience with RUSM or a member of the RUSM community. It is the mechanism for investigating and attempting to resolve complaints raised by students. The student complaint procedure can be found in the student handbook <http://medhandbook.rossu.edu/>.

“Speak Up” refers to the Adtalem Speak Up Program, a reporting system managed by a third-party vendor (Convercent), which encourages members of the RUSM community to come forward with questions or concerns, including allegations of sex and/or gender-based misconduct. Reports can be made anonymously, or reporters can provide their name and contact information. Colleagues are expected to ask legal, compliance and ethics questions and report suspected wrongdoing. Colleagues and students can utilize the Speak Up program by contacting the third-party contractor Convercent by phone at **1.800.461.9330 (in the U.S.) or 1.855.203.6928 (in Barbados)**, or online at www.speakupadtalem.com.

“Stranger” and **“Non-stranger”** are terms to describe the association between a victim of sexual harassment or sexual misconduct and the Respondent. A “Stranger” is a person(s) not known by the victim at the time of the alleged sexual harassment or sexual misconduct. A “Non-stranger” is a person(s) known by the victim, whether the person(s) is known casually, intimately or for a short or long period at the time of the alleged sexual

harassment or sexual misconduct. RUSM's Sex and Gender-Based Misconduct Response and Prevention Policy applies to misconduct involving both Strangers and Non-strangers, occurring on- or off-campus.

"Supportive Measures" are individualized services reasonably available upon report of sex and gender-based misconduct.

"Title IX" is a federal law which prohibits Sexual Harassment committed against persons in the United States as part of RUSM's education program or activity. RUSM's Title IX policy is <https://medical.rossu.edu/student-consumer-information>. Title IX is enforced by the U.S. Department of Education.

"Title IX Coordinator" is Kelsey Bowen, RUSM Student Affairs Coordinator (titleixcoordinator@rossu.edu or 754.208.4774) is responsible for overseeing compliance with all aspects of RUSM's Title IX policy and responsibilities.

HOW TO FILE A COMPLAINT

If you have experienced or witnessed sex and/or gender-based misconduct, RUSM encourages you to notify the Sexual Misconduct Response Coordinator as soon as possible after the incident. A report may be made to either or both the police and the Sexual Misconduct Response Coordinator. The criminal process is separate from RUSM's process. Complainants have the option to notify law enforcement directly or be assisted in doing so. If requested, RUSM will assist a victim of Sexual Harassment in contacting the police. A Complainant is not required to contact the police in order to pursue RUSM's grievance process.

Complaints against colleagues must be made within three months of the alleged incident to preserve RUSM's full range of range of sanctions, including termination.

A report can be filed with a manager, one-up manager, incident commander, designated local campus administrator or through the Sexual Misconduct Response Coordinator.

Sexual Misconduct Response Coordinator: Kelsey Bowen

Coordinator, Student Affairs
Ross University School of Medicine
2300 SW 145th Avenue |
Suite 200 | Miramar, FL 33027
754.208.4774 | TitleIXCoordinator@RossU.edu

Reports can be made by victims, third parties or bystanders with the option to remain anonymous through the Speak Up program by phone at **1.800.461.9330 (in the U.S.) or 1.855.203.6928 (in Barbados)**, or online at www.speakupadtalem.com. Timely response to electronic reports should occur within 12 hours of initial receipt.

If a victim wishes to access local community agencies for support or law enforcement to make a report, upon request, RUSM will assist the victim in making these contacts. Direct assistance, though limited, remains available when reports are made anonymously through Speak Up.

Anyone may make a report regarding any information pertaining to violations of this Policy. All RUSM colleagues (faculty, staff, administrators and student workers) who are not otherwise identified in this Policy or through institutional addendums as confidential resources are required to immediately provide any information received about any actual or suspected sex and/or gender-based misconduct impacting the RUSM community to

appropriate officials with some very narrow exceptions discussed elsewhere in this Policy (see “Confidentiality”). Regardless of how notice is received, reports may prompt a need for RUSM to investigate.

REPORTING BY COLLEAGUES TO EXTERNAL AUTHORITIES

Colleagues who are made aware of a possible violation of this Policy are required to contact their manager or one-up manager and also the Sexual Misconduct Response Coordinator. Colleagues can also submit named or anonymous reports of sexual and/or gender-based misconduct by utilizing the Adtalem “Speak Up” hotline at www.speakupadtalem.com.

Colleagues should contact the Sexual Misconduct Response Coordinator with any questions about whether a report to law enforcement is appropriate. Nothing in this Policy prohibits a student or colleague from reporting a crime directly to local authorities.

Disciplinary procedures are independent of any and all procedures and proceedings under local, state or federal criminal or civil law. In all cases, RUSM reserves the right to refer cases for parallel criminal prosecution or to pursue sanctions regardless of criminal prosecution. Violations of this Policy by a visitor, volunteer, vendor, agents or other third parties affiliated with RUSM may also result in the termination of pre-existing or future relationships.

COMPLAINANT’S RIGHTS

RUSM will implement Supportive Measures to protect victims of sex and gender-based misconduct and maintain a positive learning and working environment by minimizing or eliminating contact between Complainant and Respondent and providing reasonable academic, employment, and administrative accommodations. See “Supportive Measures” paragraph above for additional details.

Complainant’s rights include:

1. The right to notify or not notify law enforcement and to request and receive assistance from RUSM in making a report if desired.
2. The right to summary information on all available response options, such as complaint resolution procedures, including the necessary steps and potential consequences of each option whether or not a formal report is made to the institution.
3. The right to be free from undue coercion from RUSM to pursue or not pursue any course of action.
4. The right to be informed of the institution’s role regarding orders of protection, no contact orders, restraining orders or similar lawful orders issued by a civil, criminal or tribal court (when applicable). RUSM abides by orders of protection (including no-contact orders and restraining orders), which are generally issued by a municipal court to protect a person or entity in a situation involving sexual assault. RUSM may also liaise with local authorities to assist an individual who wishes to obtain protective or restraining orders.
5. The right to request and receive information on how to make a confidential report for the purposes of tracking campus crime without otherwise divulging details that would require or permit RUSM to investigate and respond (when the incident has not yet been reported to a colleague required to notify the Sexual Misconduct Response Coordinator).

6. The right to contact information for the Sexual Misconduct Response Coordinator, available confidential advisors, community-based resources (sexual assault crisis centers or other appropriate support services), campus security and/or local law enforcement.
7. The right to be fully informed of any applicable disciplinary conduct process and procedures.
8. The same rights as the Respondent to attend and have a support person of their choice and/or witnesses present at student conduct hearings and any meetings leading up to such a hearing.
9. The right to be informed of the outcome of any student or colleague conduct process involving alleged sex or gender-based misconduct regardless of participation in the process leading to that outcome. In the case of student conduct proceedings, victims have the right to appeal the outcome.
10. The right to request Supportive Measures.
11. The right to obtain and have enforced a campus-issued limiting instruction or no contact order or a court issued order of protection or no contact order.
12. The right to be informed about RUSM's ability to provide assistance, upon request, in accessing and navigating campus and/or community resources for health, mental health, advocacy, and/or other services for survivors of sexual assault, relationship violence and other forms of sexual misconduct.
13. The right to be free from any suggestion that they are at fault or should have acted in a different manner to avoid reported sex or gender-based misconduct.
14. The right to not be required to describe the incident to more representatives than absolutely necessary for proper investigation and response and under no circumstances will a victim be required to repeat details of the incident to secure appropriate accommodations.
15. The right to make an impact statement during the point in any conduct review process where the decision maker is prepared to deliberate on appropriate sanctions.

CONFIDENTIALITY

RUSM wishes to create an environment in which individuals feel free to discuss concerns and make complaints. RUSM understands that victims, witnesses and others involved in the investigation process may be concerned about the confidentiality of the information they are sharing. In some cases, however, RUSM may be obligated to take action when it becomes aware of information relating to a complaint.

Confidentiality in cases of sex and/or gender-based misconduct will be maintained to the extent permissible by law and consistent with RUSM's obligations in investigating complaints. Once an individual discloses identifying information to RUSM through the processes described above and in the applicable complaint procedures, that person will be considered to have filed a complaint with RUSM.

While the confidentiality of information received, the privacy of individuals involved and compliance with the wishes of the Complainant or witnesses cannot be guaranteed, they will be respected to the extent possible and appropriate.

If students or colleagues wish to speak with someone who can assure confidentiality, they may contact a Confidential Advisor.

Confidential Resource: **Dr. Dahlia Gibson**
Director of Counseling
Ross University School of Medicine
Two Mile Hill, St. Michael, Barbados BB11093
dgibson@rossu.edu

Students are also encouraged to access counseling services available through the RUSM Office of Consultation and Support Services Counseling in Barbados at **246.245.1622**, the RUSM Office of Counseling Consultation and Support Services in Miramar at **754.208.4706**, or the RUSM Care Team at rusmcares@rossu.edu. Colleagues may contact AskHR at **1.855.882.4770** for information on available resources.

These confidential resources permit discussion of an incident without beginning the investigation process. Local or profession specific mandatory reporting laws related to certain types of concerns (i.e., child sexual abuse) may still trigger a requirement for a confidential resource to report an incident to identified enforcement agencies.

SUPPORT AND RESOURCES

Upon report of alleged sex and/or gender-based misconduct, the Sexual Misconduct Response Coordinator will offer individualized appropriate support (“Supportive Measures”) or refer the victim directly to immediate assistance. Supportive Measures are available to the Respondent or Complainant, as appropriate. Examples include academic accommodations, changes in housing for the victim or a Respondent student, changes in working situations and other arrangements as may be appropriate and available (such as limiting orders, campus escorts, transportation assistance or targeted interventions).

Victims of sexual assault, dating violence, domestic violence and/or stalking will also be provided with written notification about existing counseling, health, mental health, victim advocacy, legal assistance, visa and immigration assistance, student financial aid and other services available.

RUSM will keep confidential the victim’s identity and any accommodations or Supportive Measures provided, to the extent that maintaining such confidentiality will not impair RUSM’s ability to provide the accommodations or Supportive Measures.

Supportive Measures are individualized and appropriate based on the information gathered by the Sexual Misconduct Response Coordinator. If circumstances related to an incident change over time, these and other Supportive Measures may be revisited. RUSM may also provide referrals to counseling services, at the victim’s option, including but not limited to the confidential colleague and student support services outlined above (See “Reporting”). Local resource lists can also be found through student services. A brief list of national and international referral sites can be found at the end of this Policy.

ADDITIONAL RESOURCES FOR COMPLAINANTS

Local Resources can be found in the RUSM’s Annual Security Report distributed to each campus community and posted on the Student Consumer Information page of RUSM’s website. The reports are available by location in a drop-down menu and contain lists of local resources available to victims of sex and gender-based misconduct. The resource lists are updated annually.

To access this information, go to: <https://medical.rossu.edu/student-consumer-information>

Additionally, the following resources exist to provide information and links to external assistance:

- **National Sexual Assault Hotline** 1.800.656.HOPE (4673) rainn.org
- **National Domestic Violence Hotline** 1.800.799.7233 (TTY) 1.800.787.3224 thehotline.org
- **National Network to End Domestic Violence** nnedv.org womenslaw.org
[Legal information and resources]
- **National Center for Victims of Crime** victimsofcrime.org
- **loveisrespect** 1.866.331.9474 (TTY) 1.866.331.8453 loveisrespect.org
- **National Suicide Prevention Hotline** 1.800.273.TALK (8255) suicidepreventionlifeline.org
- **Americans Overseas Domestic Violence Crisis Center** 1.866.USWOMEN (International Toll-Free)
crisis@866uswomen.org
- **U.S. Embassy** usembassy.gov
- **Child Welfare Information Gateway** childwelfare.gov
- **State Statutes Including Mandatory Reporting Laws** childwelfare.gov/topics/systemwide/laws-policies/state

AMNESTY FOR COMPLAINANTS AND WITNESSES

RUSM will investigate allegations of sex and gender-based misconduct, including when drugs or alcohol may have been involved. RUSM encourages the reporting of sex and gender-based misconduct by victims and witnesses who are sometimes hesitant to report to RUSM officials or participate in the resolution processes because of concern that they may be accused of policy violations, such as underage drinking or drug use at the time of the incident. It is in the best interest of the community that victims and witnesses come forward to share what they know regarding violations of this Policy. To encourage reporting, RUSM grants victims and witnesses amnesty, when appropriate, for potential RUSM policy violations and provides all parties and witnesses other interim measures as appropriate or needed.

Similarly, RUSM encourages direct assistance to those in need as a result of sex or gender-based misconduct. In instances where minor policy violations are revealed as a result of a person providing assistance to a victim, policy violations should not be overlooked; however, RUSM may provide educational options, rather than punitive sanctions, to those who offer their assistance.

COMPLAINT DISMISSAL

RUSM may dismiss a Formal Complaint if the Complainant informs the Sexual Misconduct Response Coordinator, in writing, that he, she, or they withdraw the Formal Complaint or allegations therein; the Respondent is no longer enrolled or employed by RUSM; or if specific circumstances prevent RUSM from gathering sufficient evidence to reach a determination. If a Formal Complaint is dismissed, the parties will be provided written notice of the dismissal outlining the reason(s) for dismissal.

EMERGENCY REMOVAL

RUSM can remove a Respondent entirely or partially from an educational Program or Activities on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical or safety of any student or other individual justifies removal. The risk analysis is performed by the Sexual Misconduct Response Coordinator in conjunction with the Director, Enterprise Safety and Security.

In cases in which an emergency removal is imposed, the Respondent will be given notice of the action and the option to request to meet with the Sexual Misconduct Response Coordinator prior to such action/removal being

imposed, or as soon thereafter as reasonably possible, to show cause why the action/removal should not be implemented or should be modified. This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the emergency removal is appropriate. When this meeting is not requested in a timely manner, objections to the emergency removal will be deemed waived.

The Sexual Misconduct Response Coordinator has sole discretion under this policy to implement or stay an emergency removal and to determine the conditions and duration. Violation of an emergency removal under this policy will be grounds for discipline, which may include expulsion or termination.

RUSM will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns. As determined by the Sexual Misconduct Response Coordinator, these actions could include, but are not limited to: temporarily re-assigning a Colleague, restricting a student's or Colleague's access to the campus, allowing a student to withdraw or take grades of incomplete without financial penalty, and authorizing an administrative leave.

GRIEVANCE PROCESS

RUSM utilizes a prompt, equitable and impartial grievance process to evaluate reports. Personnel involved in the grievance process will be free from conflicts of interest or bias for or against the parties.

The parties will receive equal opportunity to provide information, witness statements, evidence, and other information that may be necessary to fully evaluate the alleged offense. Both parties will be afforded equitable rights and access during the grievance process.

Generally, the grievance process consists of a report, investigation, live hearing (including cross-examination), determination, disciplinary measures, remedies and appeal (if applicable). The grievance process, barring extenuating circumstance, will conclude within 90 calendar days from the date a report is received. The parties will be notified by the investigator or decision-maker if the process will take longer than 90 days.

ADVISOR

The parties may be accompanied by an advisor of their choice. If a party does not have an advisor present at the live hearing, the RUSM will select and provide an advisor, without fee or charge, to conduct cross-examination of witnesses on behalf of that party. The parties may not conduct cross-examination.

Choosing an advisor who is a witness in the grievance process creates potential for bias and conflict of interest. A party who chooses an advisor who is also a witness can anticipate that issues of potential bias will be explored by the Decision-Maker.

The parties are expected to ask and respond to questions on their own behalf throughout the investigation phase of the grievance process. Advisors are expected to advise without disrupting proceedings. For example, advisors should not address RUSM officials in a meeting or interview unless invited to. An advisor may not make a presentation during any meeting or proceeding and may not speak on behalf of the party to the investigation or other Decision-Maker except during a live hearing, during cross-examination. If an advisor is disruptive or otherwise fails to respect the limits of the advisor role, the meeting or interview may be ended.

Advisors are expected to maintain the privacy of the records shared with them. These records may not be shared with third Parties, disclosed publicly, or used for purposes not explicitly authorized by RUSM. Ross University School of Medicine may seek to restrict the role of any advisor who does not respect the sensitive nature of the process or who fails to abide by the RUSM's privacy expectations.

INVESTIGATION

When the Complainant chooses or RUSM believes it is necessary, a prompt, fair and impartial process from the initial investigation to the final result to resolve reports of sex and gender-based misconduct. In the event a Complainant requests that an investigation not occur, their request will be honored when possible and unless RUSM determines in good faith that failure to investigate creates a potential risk of harm to the Complainant or other member of the RUSM community.

If an investigation is initiated, the process will be conducted by officials of the Office of Equity and Access, or its designee, who will receive annual training on the issues related to sex and gender-based misconduct, including sexual assault, dating violence, domestic violence and stalking and on how to conduct an investigation and hearing process that protects the safety of victims and promotes accountability. RUSM officials who do not have a conflict of interest or bias for or against the Complainant or the Respondent will conduct the process.

Generally, an investigation will consist of interviewing the Complainant, the Respondent and any witnesses. The parties will be provided an equal opportunity to present fact and expert witnesses or other evidence. The parties (and their advisors) will be provided with evidence directly related to the allegations, in electronic format or hardcopy, with at least 10 days for the parties to inspect, review, and respond to the evidence. The Investigator will consider the responses received from the parties before issuing the investigative report.

Once the investigation has concluded, the Investigator will draft an investigative report (hardcopy or electronic) that fairly summarizes relevant evidence. The investigative report will be sent to the parties (and their advisors) at least 10 days prior to a live hearing. The parties may provide a written response to the investigative report.

The colleague complaint procedure, which details the investigation and resolution processes for prohibited colleague conduct, can be found on the Commons (**apps.adtalem.com** > **Commons- HR Portal > Policy Central**).

Privacy of the records specific to a sex and/or gender-based misconduct investigations are maintained in accordance with applicable law, including the Family Educational Rights and Privacy Act (FERPA). Any public release of information to issue a timely warning will not include the names of victims or information that could easily lead to a victim's identification. In appropriate instances, pertinent Supportive Measures and the results of disciplinary hearings regarding the Respondent will be disclosed to the Complainant. Confidentiality will be maintained whenever possible; however, RUSM reserves the right to exercise discretion and disclose details of an incident or allegation to assure community safety or the safety of an individual.

INFORMAL RESOLUTION

If the Sexual Misconduct Response Coordinator deems appropriate and both parties voluntarily consent in writing, Formal Complaints can be resolved through informal resolution, such as mediation. The Sexual Misconduct Response Coordinator will facilitate an appropriate informal resolution process depending on the nature of the allegations, the parties involved, and the overall circumstances. Informal resolution will be conducted by a facilitator, who will be designated by the Sexual Misconduct Response Coordinator. At any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process. Informal resolution is unavailable to resolve allegations that a Colleague sexually harassed or sexual assaulted a student.

LIVE HEARING

If a report is not resolved informally, RUSM will conduct a live hearing. Live hearings are facilitated by a designated Decision-Maker. The Decision Maker will be selected by the Office of Equity and Access. The Decision-Maker consists of a panel of no fewer than three (3) members, designated from the hearing panel.

Cross-examination during the live hearing will be conducted directly, orally, and in real time by the party's advisor and not by a party personally. The Decision-Maker will permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including that challenge credibility. Only relevant cross-examination questions (as well as other questions deemed pertinent at the discretion of the Decision-Maker) may be asked of a party or witness. Before a Complainant, Respondent, or witness answers a cross-examination question, the Decision-Maker must first determine whether the question is relevant and explain to the party's advisor asking cross-examination questions any decision to exclude a question as not relevant.

Rape shield protections are applied to Complainants, deeming irrelevant questions and evidence about a Complainant's prior sexual behavior unless offered to prove that someone other than the Respondent committed the alleged Sexual Harassment or offered to prove consent.

As of August 24, 2021, and pursuant to the Department of Education's August 24, 2021 guidance, the Decision-Maker may consider statements from a party or witness who are not present at the live hearing in reaching a determination regarding responsibility, so long as the questions are otherwise permissible. However, the Decision-Maker will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer questions.

At the request of either party, RUSM will provide for the entire live hearing (including cross-examination) to occur with the parties located in separate rooms with technology enabling the parties to see and hear each other. Live hearings may be conducted with all parties physically present in the same geographic location or, at RUSM's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually. An audio or audiovisual recording, or transcript, of any live hearing will be created and maintained for seven (7) years.

Individuals participating in the live hearing cannot be disruptive and must follow the policies and procedures set by RUSM. The Decision-Maker has the authority to enforce decorum.

STANDARD OF EVIDENCE

The Decision-Maker will utilize the preponderance of evidence standard to determine if a violation of the Sex and Gender-Based Misconduct Response and Prevention Policy occurred. The preponderance of evidence standard means that based on all the information available, it is more likely than not that the alleged sexual harassment or sexual misconduct occurred.

EVIDENCE LIMITATIONS

RUSM will not use, rely on or seek disclosure of information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege. RUSM will not access or use a party's medical, psychological, and similar treatment records unless the party provides voluntary, written consent. Prior sexual behavior unless offered to prove that someone other than the Respondent committed the alleged sexual misconduct or offered to prove consent. Past findings of domestic violence, dating violence, stalking or sexual assault may be admissible in the review process stage that determines sanction.

WRITTEN DETERMINATION

Once complete, the parties will be simultaneously informed in writing of the outcome. Notice to both parties will include the written statement detailing the factual findings supporting the determination and the rationale for the sanction/discipline (if any) to the degree possible and always when the sanction/discipline is directly relevant to that individual. The notice will also include appeal procedures, if applicable, and when the results become final.

DISCIPLINARY REVIEW AND ACTION

Acts of sex and/or gender-based misconduct are subject to disciplinary action. Disciplinary actions against the Respondent will not be imposed before completion of RUSM's grievance process. Following a determination of responsibility, appropriate corrective action will be taken, and RUSM will take steps to prevent recurrence. Disciplinary actions taken will be determined on a case-by-case basis. Disciplinary action is not intended to determine criminal responsibility. Rather, it is intended to identify and respond to violations of RUSM policy and community standards. Separate and distinct disciplinary action may also be considered in instances of retaliation against those who in good faith report or disclose an alleged violation of the comprehensive policy, file complaint, or otherwise participate in the complaint resolution procedure. Failure to abide by imposed disciplinary actions (whether by refusal, neglect or any other reason), may result in additional disciplinary action, including suspension or termination. Failure by Respondent to adhere to Disciplinary Action will be considered a form of retaliation or an extension of the initial allegations.

Individuals who make a materially false statement in bad faith in the course of a grievance process under this Policy will be subject to RUSM's Code of Conduct policies.

REMEDIES

Remedies are provided to a Complainant whenever a Respondent is found responsible and may be disciplinary and punitive. Student remedies are designed to maintain the Complainant's equal access to education. Remedies will be determined on a case-by-case basis and reasonable under the circumstances. Remedies may include supportive measures.

SANCTIONS FOR STUDENT MISCONDUCT

If RUSM determines that sex and/or gender-based misconduct has occurred, appropriate disciplinary sanctions for substantiated violations of this Policy by students, up to and including expulsion, will be imposed in accordance with the Code of Conduct applicable to students found at <http://medhandbook.rossu.edu/>. The full list of available sanctions is provided in the Code of Conduct applicable to students.

This Policy statement is not intended to replace or substitute for the Code of Conduct applicable to students. This Policy is a supplement to the community standards that the Code of Conduct applicable to students sets forth. In addition, violations of this Policy may trigger application of sanctions to a student imposed under local, state or federal law.

SANCTIONS FOR COLLEAGUE MISCONDUCT

Disciplinary sanctions for a colleague's violation of this Policy may include written reprimand, warning, probation, suspension, housing suspension, housing expulsion, limiting order, change in job assignment, office relocation, reduction of awards under the management incentive plan, or termination of employment or contract, and will be imposed in accordance with applicable RUSM policies and procedures.

RUSM reserves the right to impose further and/or different sanctions appropriate to an individual situation. In addition, violations of this Policy may trigger application of sanctions to a colleague imposed under local, state or federal law.

Colleagues are also subject to processes and discipline determined by the Human Resources Department. The HR process is separate and apart from the Sexual Misconduct Response process and not constrained by the outcome of the Sexual Misconduct Response process.

APPEAL

Both parties have the right to appeal a determination regarding responsibility, RUSM's dismissal of a Formal Complaint or any allegations therein if: (1) procedural irregularity affected the outcome of the matter; (2) there is newly discovered evidence that could affect the outcome of the matter; (3) a conflict of interest or bias, that affected the outcome of the matter; and/or (4) the proposed Remedy was not reasonable based on the evidence compiled during the investigation

An appeal must be submitted in writing to the Sexual Misconduct Response Coordinator within ten days of the delivery of the Written Determination.

RETALIATION PROHIBITED

Retaliation (including intimidation, threats, coercion or discrimination) against an individual for raising an allegation of sexual and/or gender-based misconduct, for cooperating in the investigative is prohibited. If you believe you have been retaliated against, you should follow the procedures outlined in RUSM's Retaliation policy located in the Student Handbook. Colleagues should refer to the Retaliation policy located in the Global Employee Handbook.

TRAINING FOR SEXUAL MISCONDUCT RESPONSE PERSONNEL

RUSM ensures that its Sexual Misconduct Response personnel have adequate training. The Sexual Misconduct Response Coordinator and Investigators are trained on the definition of Sexual Harassment, the scope of RUSM's education Program or Activity, how to conduct an investigation, RUSM's grievance process (including hearings, appeals, and informal resolution processes, as applicable) and how to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Decision-Makers are trained on the definition of Sexual Harassment, the live hearing process, technology to be used in live hearings, and issues of relevance (including how to apply the rape shield protections provided for Complainants). Informal resolution facilitators are trained on the informal resolution process.

Materials used to train Sexual Misconduct Response personnel are posted on RUSM's website and may also be requested directly from the Sexual Misconduct Response Coordinator.

RUSM will provide primary prevention and awareness programs to prevent Sexual Assault, Dating Violence, Domestic Violence and Stalking to incoming students and new Colleagues during their first semester.

BIAS/CONFLICT OF INTEREST

To raise any concern involving bias or conflict of interest by the Sexual Misconduct Response Coordinator, contact the Director of the Office of Equity and Access, Dwight Hamilton, by phone at 312.651.1458 or by email at equity@adtalem.com. Concerns of bias or potential conflict of interest by any other personnel should be raised with the Sexual Misconduct Response Coordinator.

TIMELY WARNING REQUIREMENTS

College administrators will issue timely warnings for incidents reported that pose a substantial threat of bodily harm or danger to other members of the campus community. RUSM will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. RUSM reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status.

Personally identifiable information for victims of Sexual Assault, Dating Violence, Domestic Violence and Stalking will not be included in any publicly available recordkeeping, including safety reporting and disclosures such as the ASR.

PREVENTION AND AWARENESS

Acts that are deemed to fall within the scope of this Policy are violations of the Codes of Conduct as well as the expectations of members of the RUSM community. These acts may also be crimes. In an effort to increase the likelihood of intervention and reduce the risk of sex and/or gender-based misconduct from occurring among its students and colleagues, RUSM is committed to providing primary and ongoing awareness and prevention programming.

Primary and ongoing awareness and prevention programs will cover the continuum of issues contemplated by this Policy. Themes will include situational awareness and prevention strategies, such as bystander intervention and other forms of risk reduction. While bystander intervention specifically refers to the safe and effective ways in which third parties can intervene to thwart sex and/or gender-based misconduct, risk reduction also encompasses various strategies to eliminate or reduce risk of harm by avoiding or removing oneself from situations that are dangerous or uncomfortable. Awareness programs are events that occur online or in person that invite active engagement of community members. It is the expectation and responsibility of each member of the RUSM community to participate in programming which will assist with ongoing prevention efforts as well as effective and efficient identification and response when sex and/or gender-based misconduct does occur.

Primary prevention and awareness programming will include a comprehensive online education platform intended for viewing by all colleagues and students as well as student-facing vendors if necessary and appropriate. The program will be completed by:

- New students and transfer students within three weeks of the start of the student's first session
- Returning and continuing students who did not take the training as a new or transfer student within three weeks of the start of the session the student is scheduled to resume or continue studies
- Colleagues by the date stated in email notification
- Specific vendors by the date stated in email notification

Access to the primary prevention program and its contents will be ongoing throughout the participant's relationship with RUSM. Members of the RUSM community are encouraged to visit this resource regularly for personal, professional and academic purposes.

Ongoing prevention and awareness campaigns are public service announcements and campaigns as well as messages and activities integrated into the day-to-day fabric of the academic community. These initiatives are intended to reinforce increased awareness regarding sex and/or gender-based misconduct and prevention strategies throughout the year. RUSM will continually seek formal and informal ways to incorporate additional awareness and prevention strategies, e.g., active and passive educational campaigns, such as social norms poster

campaigns, newsletter articles, presentations and volunteerism with local community resource agencies. When additional ongoing education is provided, the organizer will report that event, activity or effort to the Sexual Misconduct Response Coordinator for record keeping and quality assurance purposes. Toolkits including ideas and resources that support ongoing efforts and are related to the primary prevention and awareness programming, will be made available to any campus upon request.

Risk Reduction Tips

Responsibility for sexual misconduct rests with those who commit such acts. Risk reduction tips are not intended to blame the victim. There are precautions we all can take which may limit our exposure to situations which may result in non-consensual sexual acts.

- Communicate limits/ boundaries and respect the limits/boundaries of others.
- Clearly and firmly say “No” to a sexual aggressor.
- If possible, leave the physical presence of a sexual aggressor or otherwise violently aggressive person.
- If someone is nearby, ask for help.
- Take responsibility for your alcohol/drug use. Acknowledge that alcohol/drugs lower sexual inhibitions and may make you vulnerable to someone who sees an impaired person as a sexual opportunity.
- Do not take advantage of someone’s intoxication or altered state even if alcohol or drugs were consumed willingly.
- If you choose to share intimate images, pictures, videos or content with others, even those you trust, be clear about your expectations regarding how the information may be used, shared or disseminated. If such information is shared with you, do not share it with others.
- Take care of friends and ask that they take care of you.
- As a sexual initiator, clearly communicate your intentions and give your sexual partner the opportunity to clearly communicate the same.
- Do not make assumptions about consent, sexual availability, sexual attraction, how far an interaction can go or about physical and/or mental ability to consent.
- Remember that consent should be affirmative and continuous. If there is any question or ambiguity, you should proceed as if you do not have consent.
- Consider mixed messages from a partner to be an indication that sexual conduct should stop so that better communication can occur.
- Recognize the potential for a sexual partner to feel intimidated or coerced by you as a result of a power advantage, your gender, your demeanor or your physical presence. Do not use or abuse that power.

Bystander Intervention Strategies

Intervention by classmates, colleagues and others within proximity to the precursors or signs of possible sexual assault, sexual exploitation, dating violence, domestic violence or stalking can significantly impact the course of an interaction between a latent perpetrator and victim. Bystanders may also encourage friends, classmates and colleagues who are already experiencing victimization to seek assistance sooner than they may have without encouragement, support or acknowledgment. Community members are encouraged to recognize warning signs and to consider possible methods of interference in various scenarios before opportunities to intervene arise. By planning ahead, we all maximize the likelihood of being empowered to take safe actions to either prevent sexual misconduct or offer paths to eliminate ongoing victimization.

When a member of the RUSM community observes threatening, coercive, forceful, aggressive or harassing behavior, it is important to assess the situation to determine the best possible course of action for all concerned. Some forms of intervention are direct, while others will be less apparent to the perpetrator or others within range of the interaction. Examples include but are not limited to:

- Making up an excuse to get someone out of a dangerous situation.
- Stepping in to change the course of an interaction.
- Warning potential or perceived perpetrators that their actions may lead to severe consequences.
- Refusing to leave the company of a potential victim despite efforts by an aggressor or pursuer to get the potential victim alone.
- Taking steps to reduce alcohol or drug consumption within a potentially dangerous social situation.
- Calling and cooperating with security, administration, the police or others to assist with intervention and accountability.
- Expressing concern or offering resources when you notice someone with unexplained or frequent injuries.
- Refusing to consider sex and/or gender-based misconduct a personal or private matter between the victim and the perpetrator.

PROCEDURES TO FOLLOW AFTER A SEXUAL MISCONDUCT INCIDENT

Victims of any sexual misconduct that might constitute a crime, including domestic violence, dating violence, sexual assault, stalking and rape (including acquaintance rape) that impacts the RUSM community have the option and are encouraged to contact local law enforcement authorities. The criminal process is separate from RUSM's process.

Whenever possible, victims should report a violation of this Policy as soon as possible and preserve evidence as may be necessary to prove that domestic violence, dating violence, sexual assault or stalking occurred, or to obtain a protection order. Victims of sexual assault or rape are strongly encouraged to report the incident as described in this Policy to deter future assaults and to ensure that victims receive the services they need. Steps should be taken to help deal with physical and emotional trauma associated with the violation. Recommended steps include:

1. Go to a safe place; go somewhere to get emotional support.
2. Consider reporting the incident to the police. Victims are not required to report an incident to law enforcement authorities, but RUSM will assist the victim with contacting the police, if requested.
3. Report the misconduct to the manager of student services, sr. manager of campus operations, one-up manager, campus incident commander, local RUSM leadership, Sexual Misconduct Response Coordinator or the CRC.
4. For your safety and well-being, immediate medical attention is encouraged. Time is a critical factor for evidence collection and reservation that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining an order of protection. Being examined as soon as possible, ideally within 120 hours, is important especially in the case of rape and other forms of sexual assault. To preserve evidence, it is recommended that, if at all possible, you do not bathe, shower, douche, eat, drink, smoke, brush your teeth, urinate, defecate or change clothes before that exam. Even if you have already taken any of these actions, you are still encouraged to have prompt medical care. Additionally, you are encouraged to gather bedding, linens or unlaundered clothing and any

other pertinent articles that may be used for evidence. Secure them in a clean paper bag or clean sheet. Completing a forensic examination does not require someone to file a police report. To find a location near you that performs free forensic examinations, call the National Sexual Assault Hotline at (800) 656-4673. Resources are also available through the Rape Abuse & Incest National Network (RAINN); www.RAINN.org.

5. Even after the immediate crisis has passed, consider seeking professional counseling and the support of local and specialized support agencies, such as sexual assault recovery centers and domestic violence safe houses. This can help to recover from the psychological effects and provide a safe environment for recovery.

COMMITMENT TO NON-DISCRIMINATION AND NON-HARASSMENT

RUSM is committed to providing an education conducive to the personal and professional development of each individual and to maintaining an academic environment free of discrimination and harassment based on race, color, religion, national origin, sex, age, ancestry, disability, veteran status, sexual orientation, pregnancy or parental status, gender, or any other basis protected by federal, state or local law.

What is Discriminatory Harassment?

Harassment is a form of discrimination. Harassment is unwelcome, offensive behavior that is based on one of the legally protected groups listed above and which is severe or pervasive enough to create an environment that a reasonable person would consider hostile. Examples of words or conduct that may constitute harassment that would violate this Policy are:

- Verbal abuse, slurs, derogatory comments or insults about, directed at, or made in the presence of an individual or group based on protected status. This could include telephone calls, emails, instant messages, Facebook, Twitter, Instagram, or any form of electronic or written messages, etc.
- Display or circulation of written materials or pictures that are degrading to a person or group based on protected status.
- Damage to, trespass on or unauthorized use of property, such as spraying or scratching of a motor vehicle, damage or theft of property, based upon the protected status of an individual or group.
- Physical contact or verbal threats based upon the protected status of an individual or group.

WHOM TO CONTACT IF YOU THINK YOU HAVE BEEN DISCRIMINATED AGAINST OR HARASSED

The Student Service Manager, Dean of Campus Operations Program Dean/Director and/or Dean of Academic Affairs are available to serve as a resource to any student or other member of the RUSM community who has a discrimination or harassment inquiry or complaint. These resource persons have information about RUSM's non-discrimination policy, rules and procedures (including information about confidentiality) as well as options available for the investigation and resolution of complaints. Individuals with a discrimination or harassment inquiry or complaint may be more comfortable speaking with someone of the same gender, and the resource persons listed can assist in finding help of the preferred gender.

Students who wish to file discrimination or harassment complaints against RUSM should follow the Student Complaint/Grievance Procedure found in this handbook.

Students who wish to file discrimination or harassment complaints against a fellow student should follow the Professional Conduct Procedure found in this handbook.

Complaints involving discrimination or harassment should be reported to Dwight Hamilton, Director, Office of Equity and Access (equity@adtalem.com or 312.651.1458).

CAMPUS SEX CRIMES PREVENTION ACT

The Campus Sex Crimes Prevention Act requires sex offenders already required to register in a State to provide notice, as required under State law, to each institution of higher education in that state at which the person is employed, carries on a vocation, or is a student. The act requires that state procedures ensure this registration information is promptly made available to law enforcement agencies with jurisdiction where the institutions of higher education are located and that it is entered into appropriate state records or data systems. These changes became effective two years after enactment of the law (2002).

This act amends the Higher Education Act of 1965 to require institutions of higher education to issue a statement, in addition to other disclosures required under that Act, advising the campus community where law enforcement agency information provided by a State concerning registered sex offenders may be obtained. This change takes effect two years after enactment (2002).

This act amends the Family Educational Rights and Privacy Act of 1974 to clarify that nothing in that Act may be construed to prohibit an educational institution from disclosing information provided to the institution concerning registered sex offenders; requires the Secretary of Education to take appropriate steps to notify educational institutions that disclosure of this information is permitted.

To check registered sex offenders in a state see the State Sexual Offender Registry List section.

STATE SEXUAL OFFENDER REGISTRY LIST

ALABAMA

Website:

http://sheriffalerts.com/cap_office_disclaimer.php?office=54247&fwd=aHR0cDovL3d3dy5jb21tdW5pdHlub3RpZmljYXRpb24uY29tL2Nhcf9tYWluLnBocD9vZmZpY2U9NTQyNDc=

Phone Number: 334-676-7250

ALASKA

Website: <https://dps.alaska.gov/SORWeb/>

Phone Number: 907-269-0396 or 800-658-8892 (outside Anchorage in Alaska)

ARIZONA

Website: <https://www.azdps.gov/services/public/offender>

Phone Number: 602-255-0611

ARKANSAS

Website: <https://www.ark.org/offender-search/index.php>

Phone Number: 501-682-2222

CALIFORNIA

Website: <http://www.meganslaw.ca.gov/>

Phone Number: 916-327-5413

COLORADO

Website: <https://apps.colorado.gov/apps/dps/sor/?SOR=home.caveat>

Phone Number: 303-239-4201

CONNECTICUT

Website: http://www.communitynotification.com/cap_office_disclaimer.php?office=54567

Phone Number: 860-685-8060

DELAWARE

Website: <https://sexoffender.dsp.delaware.gov/>

Phone Number: 302-739-5882

DISTRICT OF COLUMBIA

Website: <http://sexoffender.dc.gov/>

Phone Number: 202-727-4407

FLORIDA

Website: <https://offender.fdle.state.fl.us/offender/sops/offenderSearch.jsf>

Phone Number: 888-357-7332

GEORGIA

Website: <https://gbi.georgia.gov/services/georgia-sex-offender-registry> Primary: [\(404\) 270-8465](tel:(404)270-8465)

Phone: [\(404\) 270-8622](tel:(404)270-8622)

Email Link: gcicsexoffenders@gbi.ga.gov

HAWAII

Website: <http://sexoffenders.ehawaii.gov/sexoffender/welcome.html>

Phone Number: 808-587-3350

IDAHO

Website: http://www.isp.idaho.gov/sor_id/

Phone Number: 208-884-7305

ILLINOIS

Website: <https://isp.illinois.gov/Sor>

Phone Number: 217-785-0653

INDIANA

Website: <http://www.icrimewatch.net/indiana.php>

Phone Number: 800-622-4779

IOWA

Website: <http://www.iowasexoffender.com/>

Phone Number: 515-725-6050

KANSAS

Website: [Public Offender Registry \(ks.gov\)](http://PublicOffenderRegistry.ks.gov)

Phone Number: 785-296-2841

KENTUCKY

Website: <http://kspsor.state.ky.us/>

Phone Number: 502-227-8700

LOUISIANA

Website: <https://www.icrimewatch.net/louisiana.php>

Phone Number: 800-858-0551

MAINE

Website: <http://sor.informe.org/cgi-bin/sor/index.pl>

Phone Number: 207-624-7270

MARYLAND

Website: <http://www.socem.info/>

Phone Number: 410-585-3600

MASSACHUSETTS

Website: <http://www.mass.gov/eopss/agencies/sorb/>

Phone Number: 978-740-6400

MICHIGAN

Website: http://www.communitynotification.com/cap_main.php?office=55242/

Phone Number: 517-241-1806

MINNESOTA

Website: <https://coms.doc.state.mn.us/PublicViewer/>

Phone Number: 651-361-7200

MISSISSIPPI

Website: <http://state.sor.dps.ms.gov/>

Phone Number: 601-987-1540

MISSOURI

Website: <http://www.mshp.dps.missouri.gov/MSHPWeb/PatrolDivisions/CRID/SOR/SORPage.html>

Phone Number: 888-767-6747

MONTANA

Website: <https://app.doj.mt.gov/apps/svow/>

Phone Number: 406-444-7068

NEBRASKA

Website: <https://sor.nebraska.gov/>

Phone Number: 402-471-8647

NEVADA

Website: <http://www.nvsexoffenders.gov/>

Phone Number: 775-684-6262

NEW HAMPSHIRE

Website: <https://business.nh.gov/NSOR/>

Phone Number: 800-735-2964

NEW JERSEY

Website: <http://www.njsp.org/sex-offender-registry/index.shtml>

Phone Number: 609-882-2000

NEW MEXICO

Website:

http://sheriffalerts.com/cap_office_disclaimer.php?office=55290&fwd=aHR0cDovL2NvbW11bml0eW5vdGlmaWNhdGlvbI5jb20vY2FwX2IhaW4ucGhwP29mZmljZT01NTI5MA==

Phone Number: 505-827-9297

NEW YORK

Website: http://www.criminaljustice.ny.gov/SomsSUBDirectory/search_index.jsp

Phone Number: 800-262-3257

NORTH CAROLINA

Website: <http://sexoffender.ncsbi.gov/>

Email Link: <http://sexoffender.ncsbi.gov/contact.aspx>

NORTH DAKOTA

Website: <http://www.sexoffender.nd.gov/>

Phone Number: 701-328-5500

OHIO

Website: http://www.communitynotification.com/cap_main.php?office=55149

Phone Number: 866-406-4534

OKLAHOMA

Website: [Search \(ok.gov\)](#)

Email Address: osor@doc.state.ok.us

OREGON

Website: <http://sexoffenders.oregon.gov/ConditionsOfUse>

Phone Number: 503-934-1258

PENNSYLVANIA

Website: <http://www.pameganslaw.state.pa.us/>

Phone Number: 866-771-3170

PUERTO RICO

Website: <http://sor.cjis.pr.gov/>

Phone Number: 787-721-2900

RHODE ISLAND

Website: https://www.sheriffalerts.com/cap_main.php?office=56404%20%5bsheriffalerts.com%5d

Phone Number: 401-764-5900

SOUTH CAROLINA

Website: <http://scor.sled.sc.gov/ConditionsOfUse.Aspix>

Phone Number: 803-896-2601

SOUTH DAKOTA

Website: <http://sor.sd.gov/>

Phone Number: 605-773-3331

TENNESSEE

Website: <https://www.tn.gov/tbi/general-information/tennessee-sex-offender-registry.html>

Phone Number: 888-837-4170

Email: tbisormgr@tn.gov

TEXAS

Website: <https://publicsite.dps.texas.gov/SexOffenderRegistry>

Phone Number: 512-424-2800

UTAH

Website: http://sheriffalerts.com/cap_main.php?office=54438

Phone Number: 801-495-7700

VERMONT

Website: https://www.communitynotification.com/cap_main.php?office=55275

Phone Number: 802-241-5400

VIRGINIA

Website: <http://sex-offender.vsp.virginia.gov/sor/>

Phone Number: 804-674-2825

WASHINGTON

Website: <http://www.icrimewatch.net/washington.php>

Phone Number: 360-486-2386

WEST VIRGINIA

Website: <https://apps.wv.gov/StatePolice/SexOffender/>

Phone Number: 304-746-2133

WISCONSIN

Website: <https://appsdoc.wi.gov/public>

Phone Number: 608-240-5830

WYOMING

Website: http://www.communitynotification.com/cap_main.php?office=55699

Phone Number: 307-777-7181

ALCOHOL AND SUBSTANCE ABUSE POLICY

Overview

All students, faculty, administrators, and support staff are expected to recognize the potential for alcohol and drug abuse whenever illegal drugs or alcohol are sold, given, manufactured, and/or used and that such abuse is in conflict with the University's purpose. To mitigate abuse, the University has established regulations and policies governing the use of alcohol and other substances to all students, guests, and visitors on University property or as part of any University activity. Additionally, these regulations and policies govern the use of alcohol and other substances for off campus activities. The responsibility for knowing and abiding by the provisions of these policies rests with each individual.

Medical students are held to the same ethical and behavioral standards as physicians during both the pre-clinical and clinical years of medical school. Untreated abuse and/or dependence are unacceptable to the school and are cause for disciplinary action up to and including dismissal. Both for reasons of personal well-being and because of the nature of the profession, students are expected to show restraint and responsibility regarding the use of any substance. Students are also expected to seek help for alcohol or substance abuse problems if they are aware of them. Possession or use of illegal substances or unlawful use of lawful controlled substances could result in a criminal conviction, which could preclude licensure to practice.

Applicable Law

All members of the University community shall abide by the laws of the US Federal Government, state and any local laws, ordinances and regulations where the student is located at any time during which he or she is affiliated with or represents RUSM relative to the possession, consumption, distribution, transportation, manufacture, and sale of alcoholic beverages or products.

Conviction for the possession or distribution of illegal drugs, alcohol may result in various penalties according to the nature of the offense. Please note that even where otherwise permitted under federal, state, and local laws, marijuana use or possession as a student is prohibited.

Prohibited Activities

RUSM strictly prohibits the unlawful manufacturing, distribution, dispensing, use or possession of alcohol, illegal drugs and controlled substances or the misuse of prescription medications/drugs at any time during which a student is affiliated with or representing RUSM. Please note that even where otherwise permitted under federal, state, and local law, marijuana use, possession, or influence on University premises, at University events, or that adversely affects the RUSM community, is prohibited.

Any violation of the Policy on Substance and Alcohol Abuse is considered a violation Code of Conduct and is subject to the penalties of the school in addition to local, state and federal jurisdictions.

Penalties/Sanctions

All students are expected to be familiar with and to adhere to federal, state, and local laws and university policies with regard to the use and possession of drugs or alcohol. The University will impose sanctions for violation of the standards of behavior (on and off campus) consistent with local and federal laws, and University policies. Violations will result in disciplinary action, up to and including dismissal, and referral for possible prosecution. Sanctions imposed will depend upon the severity and frequency of the violation. In addition to, or in lieu of discipline, violators may be required to complete an appropriate rehabilitation program.

Applicable sanctions include, but are not limited to, probation, probation and referral for treatment and rehabilitation (without adjudication), suspension, or non-academic dismissal. The University may refer any case to the proper local, state and/or federal authorities for appropriate legal action. Individuals disciplined under the University Policy on Substance and Alcohol Abuse have the right to an appeal in accordance with applicable University grievance procedures.

Persons convicted of drug possession under US Federal law are ineligible for federal student grants and loans for up to one year after the first conviction, five years after the second; the penalty for distributing drugs is loss of benefits for five years after the first conviction, ten years after the second, permanently after the third conviction.

The University sanctions imposed under the Policy on Substance and Alcohol Abuse neither diminish nor replace the penalties available under generally applicable civil or criminal laws. Violations of University standards may also violate federal, state and local laws, or other appropriate governance body. Violators will be subject to all appropriate penalties within the jurisdiction of the offense.

Prevention & Assistance

The University recognizes alcohol and drug abuse and dependency as clinical disorders defined in the current version of the Diagnostic and Statistical Manual (DSM-5) of the American Psychiatric Association.

Excessive drinking and drug use will lead to a wide variety of health problems and professional difficulties. The use of any amount of drug prescription, illicit or legal (including alcohol), will alter the chemical balance of the body. Misuse or compulsive use of alcohol and other drugs can often cause serious damage to major body organs such as the brain, stomach, lungs, liver, kidneys, heart, as well as, the immune and reproductive systems. Pregnant women put the fetus at risk for serious birth defects and complications at birth, as well as the possibility of delivering a baby with a drug dependency who may exhibit withdrawal signs. Other health problems include sleep disturbances, malnutrition,

convulsions, delirium and greater risk for life threatening accidents and events such as traffic deaths and suicides. Intravenous drug users, who share needles, are at high risk for contracting HIV/AIDS. Use and/or withdrawal from a substance can also create mental problems including, but not limited to depression, anxiety, paranoia, and delusions.

The use of drugs and alcohol can cause physical and psychological dependence and can interfere with memory, sensation and perception. Drugs impair the brain's ability to synthesize information. Regular users of drugs develop tolerance and physical dependence often experienced by withdrawal symptoms. The psychological dependence occurs when the drug taking becomes central to the user's life. Medical students who are aware of or suspect a colleague of abusing alcohol or drugs are encouraged to intervene and provide assistance, or to refer the matter to the medical education administration.

RUSM will facilitate substance abuse prevention through general promotion of a substance-free educational environment. In addition to the active enforcement of the Policy on Substance and Alcohol Abuse, students will be informed of any current and subsequent changes to the Policy on Substance and Alcohol Abuse. Additionally, the medical school curriculum incorporates information on the effects that alcohol and drugs have on both mental and physical health. At RUSM, an atmosphere will exist wherein individuals with alcohol and/or drug problems are encouraged to seek help.

For information or assistance with substance and/or alcohol abuse matters, or for information on programs such as Alcoholics Anonymous, an individual can confidentially contact RUSM Counseling Services.

Modeled upon the principles of the AMA's Council on Ethical and Judicial Affairs (CEJA), RUSM offers services that are geared toward ensuring the personal health of students by providing support and avoiding punitive measures. RUSM, through Student Affairs and the Counseling Services, helps coordinate intervention services, conduct screening assessments, make appropriate referrals for comprehensive assessment and treatment, provide case management services for those with continuing problems, and encourage a collegial supportive environment. Moreover, they help promote students' overall health and wellness as a priority for the profession. Students are encouraged to seek guidance from these programs at the earliest sign of need. To further utilization, help will be provided through a system that remains separate albeit appreciated by the University's disciplinary system. Consideration will be given to students who identify themselves and are seeking assistance for a substance abuse problem proactively and not as a result of an identified violation or random screening.

If a student reports to school or to a clinical setting under the influence of alcohol or drugs, they will be immediately suspended and subject to additional disciplinary action including dismissal from the University.

A list of some drug and alcohol prevention, counseling, treatment and rehabilitation, and re-entry programs is available at RUSM Counseling Services. Any student, spouse, or faculty member can confidentially contact Counseling Services for additional referral information.

DRUG FREE SCHOOLS & COMMUNITIES ACT

Educational Guidelines Pertaining to Drug Free Schools & Communities Act

RUSM expects all members of its community including students, faculty and staff, to be familiar with and to abide by applicable state, federal and local laws regarding alcohol and drugs. Students are also responsible for knowing school regulations concerning alcohol use on campus. RUSM forbids the unauthorized use, possession, distribution or sale of drugs or alcohol by a student anywhere on RUSM property. Violation of these laws or regulations may subject a student to both criminal prosecution and campus disciplinary action.

Use of illicit drugs and abuse of prescription drugs pose a serious threat to mental and physical health. Alcohol is a drug. Its use in even the smallest amounts may be harmful to some people, and when used to excess, alcohol is harmful to everyone. For this reason, responsible drinking is essential and is expected of those who choose to drink.

Substance

Alcohol (at .08 Blood Alcohol Concentration & Above)

Impaired motor abilities; reduced judgment; sleepiness; increased sexual desire but reduced ability to perform; nausea, vomiting; liver disorders-alcoholic hepatitis, alcoholic cirrhosis; cancer of the-tongue, mouth, throat, esophagus, liver, breast; fetal alcohol syndrome (most common symptom is mental retardation).

Cannabis Marijuana Hash/Hash Oil THC

Diminished-short term memory, motivation & cognition, coordination & concentration, oral communication, reaction time; anxiety & panic reactions; carcinogenic elements in smoke; damaged lungs & respiratory system.

Cocaine (includes Crack Cocaine)

Increased likelihood of risk taking; seizures; sleeplessness; paranoia; irregular heartbeat; can cause sudden death by stroke or heart failure, even in young users; cocaine psychosis (paranoia & hallucinations); ulceration of mucous membranes in the nose; sexual dysfunction; during pregnancy can cause severe physical & emotional problems in babies.

Depressants, Tranquilizers, Barbiturates, Methaqualone

Dangerous effects when mixed with alcohol; calmness & relaxed muscles; slurred speech, staggering gait, loss of motor coordination; altered perceptions; respiratory depression which can result in coma or death; disruption of normal sleep cycle; during pregnancy-birth defects, brain tumors in children; tolerance develops severe withdrawal symptoms; physical & psychological dependence.

Other Stimulants (Excluding Cocaine), Amphetamines, Methamphetamines

Increased heart & respiratory rates; elevated blood; decreased appetite; headaches; blurred vision; dizziness; sleeplessness; anxiety; amphetamine psychosis-violent behavior, hallucinations, delusions, paranoia; drug tolerance & dependency; mood swings; ulcers; mental confusion.

Psychedelics, LSD, Mescaline, Psilocybin, Phencyclidine (PCP), MDMA (Ecstasy), MDA

Distorted sense of distance, space and time; blockage of pain sensations; nausea, vomiting & diarrhea; severe mood disorders, panic depression, anxiety; greater suggestibility & feelings of invulnerability; unpredictable reactions if drugs are "cut" with impurities; tolerance after (3-4 daily doses--higher doses are required to produce same effects).

Narcotics, Opium, Morphine, Codeine, Thebaine, Heroin, Methadone, Darvon, Demerol

Feeling of euphoria followed by drowsiness; nausea & vomiting; respiratory depression; central nervous system depression; use of unsterile needles promotes-AIDS, hepatitis B, endocarditis (infection in the heart); women dependent on opiates have multiple pregnancy complications-spontaneous abortions, still births, anemia, diabetes.

LAWS REGARDING ALCOHOL AND DRUGS

BARBADOS

In addition to the Federal laws, Barbados has its own laws dealing with controlled substances.

Drug Abuse (Prevention and Control

Chapter 131

Restrictions Relating to Controlled Drugs etc.

4. (1) Subject to subsection (2), it shall not be lawful for a person to

- (a) import a controlled drug, or;
- (b) export a controlled drug.

(2) Subsection (1) does not apply

- (a) to the importation or exportation of a controlled drug which is for the time being excepted from paragraph (a) or, as the case may be, paragraph (b) of subsection (1) by regulations under section 12; or
- (b) to the importation or exportation of a controlled drug under and in accordance with the terms of an authorisation granted by the Minister and in compliance with any conditions attached thereto; or
- (c) to the importation or exportation of a controlled drug which is in transit.

(3) Subject to section 39, it is an offence for a person to import or export a controlled drug in contravention of subsection (1).

5. (1) Subject to any regulations under section 12, it shall not be lawful for a person
- (a) to produce a controlled drug; or
 - (b) to supply or offer to supply a controlled drug to another.
- (2) Subject to section 39, it is an offence for a person
- (a) to produce a controlled drug in contravention of subsection (1); or
 - (b) to be concerned in the production of such a drug in contravention of that subsection by another.
- (3) Subject to section 39, it is an offence for a person
- (a) to supply or offer to supply a controlled drug to another in contravention of subsection (1); or
 - (b) to be concerned in the supplying of such a drug to another in contravention of that subsection; or
 - (c) to be concerned in the making to another in contravention of that subsection of an offer to supply such a drug.
6. (1) Subject to any regulations under section 12, it shall not be lawful for a person to have a controlled drug in his possession.
- (2) Subject to section 39, it is an offence for a person to have a controlled drug in his possession in contravention of subsection (1).
- (3) Subject to section 39, it is an offence for a person to have a controlled drug in his possession, whether lawfully or not, which is intended, whether by him or some other person, for supply in contravention of section 5(1).
- (4) Subject to subsection (1), a person found in possession of a trafficable quantity of a controlled drug shall be deemed to be in possession of such controlled drug for the purpose of supplying it to another in contravention of section 5(1) unless the contrary is proved, the burden of proof being on the accused.
7. (1) A person commits an offence if he knowingly handles a controlled drug which is intended, whether by him or some other person, for supply in contravention of section 5(1).
- (2) A person handles a controlled drug for the purposes of this section if
- (a) he is in any way concerned in carrying, removing, harbouring, keeping or concealing the controlled drug or anything containing the controlled drug; or
 - (b) he deals in any manner with the controlled drug.
8. (1) It shall not be lawful for a person to misuse a controlled drug.
- (2) Subject to section 39, it is an offence for a person to misuse a controlled drug in contravention of subsection (1).
9. (1) It shall not be lawful for any person to have in his possession any pipe, equipment or apparatus fit and intended for use in connection with the misuse of a controlled drug or the preparation of any such drug for misuse.
- (2) Subject to section 39, it is an offence for a person to have in his possession a pipe, equipment or apparatus in contravention of subsection (1).
10. (1) It shall not be lawful for any person to do any act preparatory to the commission of an offence under section 4(3) or 5(3).
- (2) Subject to section 39, it is an offence for a person to do an act preparatory to the commission of an offence under section 4(3) or 5(3).
11. (1) Subject to any regulations under section 12, it shall not be lawful for a person to cultivate any plant of the genus Cannabis, any coca plant or opium poppy.
- (2) Subject to section 39, it is an offence to cultivate any such plant in contravention of subsection (1).
- Drug Trafficking and related offences

Drug Trafficking and related offences

18. (1) For the purposes of this Act, the expression "traffic", "trafficking" or "drug trafficking" in relation to a controlled drug means doing or being concerned, whether in Barbados or elsewhere, in any of the following:
- (a) importing or exporting a trafficable quantity of controlled drug where importation or exportation contravenes section 4(1) or a corresponding law;
 - (b) supplying a trafficable quantity of any controlled drug where supply contravenes section 5(1) or a corresponding law;

- (c) possessing a trafficable quantity of any controlled drug where possession of the drug contravenes section 6(1) or a corresponding law; and includes a person doing the following whether in Barbados or elsewhere, that is,
- (d) organising, managing or financing any of the activities listed in (a) to (c) above;
- (e) entering into or being otherwise concerned in an arrangement whereby
- (i) the retention or control by or on behalf of another person of the other person's proceeds of drug trafficking is facilitated; or
- (ii) the proceeds of drug trafficking by another person are used to secure that funds are placed at the other person's disposal or are used for the other person's benefit to acquire property by way of investment.
- (2) Save under and in accordance with this Act or any regulations under section 12, no person shall, on his own behalf or on behalf of any other person, whether or not such other person is in Barbados
- (a) traffic in a controlled drug;
- (b) offer to traffic in a controlled drug or in a substance he believes to be a controlled drug;
- (c) do or offer to do an act preparatory to or for the purpose of trafficking in a controlled drug or in a substance he believes to be a controlled drug.
- (3) Subsection (2) shall apply whether or not the controlled drug is in Barbados or is to be imported into Barbados or is ascertained or in existence.
- (4) Any person who contravenes any of the provisions of subsection (2) is guilty of an offence under this Act.

Offences in Respect of Children and Young Persons

- 21. (1) Subject to any regulations under section 12, it shall not be lawful for a person to have a controlled drug in his possession in or within a radius of 100 yards of any school premises.
- (2) Subject to section 39, it is an offence for a person to have a controlled drug in his possession in contravention to subsection (1).
- (3) Subject to section 39, it is an offence for a person to have a controlled drug in his possession in or within a radius of 100 yards of any school premises, which is intended, whether by him or some other person for supply in contravention of section 5(1).
- (4) For purposes of subsection (3), a person found in possession of a controlled drug in contravention of subsection (1) is deemed to have the controlled drug for the purpose of supplying same to another unless the contrary is proved; the burden of proof being on the accused.
- (5) In this section, "school premises" means any nursery school, primary or secondary school, technical institution, training centre, teachers' college, community college, university or any other educational institution for children or young persons and includes buildings, playing fields or other premises established or maintained by such institutions for the benefit of its pupils or students whether or not such buildings, playing fields or other premises are within the curtilage of the institution.

Section Creating Offence	General Nature of Offence	Mode of Prosecution	<u>Punishment</u>
Section 4(3)	Importation or exportation of a controlled drug contrary to section 4(1)	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years, or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both
Section 5(2)	Production or being concerned in production of a controlled drug contrary to section 5(1)	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years, or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both
Section 5(3)	Supplying or offering to supply a con- trolled drug to another or being concerned in the doing of either activity by another	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years, or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both
Section 6(2)	Having possess- ion of a controlled drug	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years, or
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both

Section Creating Offence	General Nature of Offence	Mode of Prosecution	<u>Punishment</u>
Section 6(3)	Having possession of a controlled drug with intent to supply it to another	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years, or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both
Section 7(1)	Handling a controlled drug	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years, or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both
Section 8(2)	Misusing a controlled drug	(a) Summary ...	A fine of \$100,000 or imprisonment for 2 years, or both
		(b) On indictment	A fine of \$250,000 or imprisonment for 5 years, or both
Section 9(2)	Having possession of any pipe, equipment or apparatus intended for use in connection with misuse of a controlled drug	(a) Summary ...	A fine of \$100,000 or imprisonment for 2 years, or both
		(b) On indictment	A fine of \$250,000 or imprisonment for 5 years, or both
Section 10(2)	Doing an act preparatory to the commission of an offence under section 4(3) or section 5(3)	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years, or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both

Section Creating Offence	General Nature of Offence	Mode of Prosecution	<u>Punishment</u>
Section 11(2)	Cultivation of cannabis plant, coca plant or opium poppy	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years, or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both
Section 13(1)	Being the occupier or concerned in the manage- ment of premises and permitting or suffering certain illegal activities to take place there	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years, or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both
Section 14(6)	Bringing con- trolled drugs into Barbados intransit contrary to section 14(1)	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years, or both
Section 15(5)	Removing controlled drugs from conveyance by which it is brought into Barbados in transit etc. without licence contrary to section 15(1) (a) or moving controlled drugs etc., contrary to section 15(1) (b)	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 20 years or both

Section Creating Offence	General Nature of Offence	Mode of Prosecution	<u>Punishment</u>
Section 16	Tampering with controlled drugs in transit	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 5 years or both
Section 17(6)	Diversion of controlled drugs etc. without certificate contrary to section 17(1)	(a) Summary ...	A fine of \$250,000 or imprisonment for 5 years or both
		(b) On indictment	A fine of \$500,000 or imprisonment for 5 years or both
Section 18(4)	Trafficking in a controlled drug; offering to traffic in a controlled drug or doing or offering to do an act pre- paratory to or for the purpose of trafficking in a controlled drug contrary to section 18 (2)	(a) Summary ...	A fine of \$250,000 or where there is evidence of the street value of the controlled drug three times the street value of the controlled drug, whichever is greater; and to imprisonment for 7 years
		(b) On indictment	Imprisonment for life
Section 19(1)	Assisting another to retain the benefit of drug traf- ficking	On indictment	A fine of \$200,000 or imprisonment for 20 years, or both, if the offender is a natural person or a fine of \$600,000 if the offender is a body corporate

Section Creating Offence	General Nature of Offence	Mode of Prosecution	<u>Punishment</u>
Section 20(3)	Supplying, offering to supply or doing or offering to do an act preparatory to the supply of a substance represented or held out to be a controlled drug but which is not a con- trolled drug	(a) Summary ... (b) On indictment	A fine of \$250,000 or imprisonment for 5 years, or both A fine of \$500,000 or imprisonment for 20 years, or both
Section 21(2)	Having possession of a controlled drug in or within a radius of one hundred yards of school premises	(a) Summary ... (b) On indictment	A fine of \$250,000 and imprisonment for 7 years Imprisonment for life
Section 21(3)	Having possession of a controlled drug in or within a radius of one hundred yards of school premises with intent to supply it to another	(a) Summary ... (b) On indictment	A fine of \$250,000 and imprisonment for 7 years Imprisonment for life

Liquor License Act Chapter 182

Offenses

70. (1) Any person who-

(c) being a licensee or other person authorised to sell or supply intoxicating liquor under the authority of a licence-
(vi) sells or supplies any intoxicating liquor to be consumed on the licensed premises to any person who is under sixteen years of age;

shall be guilty of an offence and shall, in addition to any punishment to which he may be liable under any other law, be liable on summary conviction to a fine of \$500 or to imprisonment for 3 months in respect of the offence mentioned in sub-paragraph (c) (ix) of subsection (1) and to a fine of \$2 500 or to imprisonment for 3 months in respect of all the other offences mentioned in paragraph (c) of that subsection.

(2) Where any person is convicted of an offence under subparagraph (iv) of paragraph (c) of subsection (1), the magistrate shall, in addition to any other penalty, order that the licence issued in respect of the licensed premises shall be forfeited.

(3) Where any person is convicted of any other offence under paragraph (b) of subsection (1), the magistrate may, in addition to any other penalty, order that the licence issued in respect of the licensed premises shall be forfeited and shall so order in the case of a second or subsequent offence under such paragraph in respect of a licence held by the same licensee.

(4) Whenever a licence is forfeited in consequence of a conviction for an offence under this section, the licensee may by order of the court by which he is tried be disqualified for any period from holding any licence.

Road Traffic CAP295

85. (1) Any person who drives, attempts to drive, or is in charge of a motor vehicle on a road while under the influence of drink or a drug to such an extent as to be incapable of having proper control of the vehicle is guilty of an offence and is liable on summary conviction

(a) to a fine of \$1000 or to imprisonment for a term of 12 months, or both, in the case of a first conviction; and

(b) to a fine of \$2 500 or to imprisonment for a term of 2 years, or both, in the case of a second or subsequent conviction.

(2) A person convicted of an offence under this section shall, unless the court for any special reason thinks fit to order otherwise, be disqualified from the date of the conviction for a period of not less than 1 year and not more than 5 years from holding or obtaining a driving licence.

(3) Where there is an appeal against a conviction under this section, a period of disqualification runs from the date of the conviction if the appeal is dismissed or allowed; but, if the appeal is discontinued, a period of disqualification runs from the date of the discontinuance of the appeal. (

4) For the purposes of this section, a person is unfit to drive if his ability to drive properly is for the time being impaired.

(5) Any member of the Police Force may arrest without a warrant any person whom he suspects on reasonable grounds of committing an offence under this section.

FEDERAL

Title 21 United States Code (USC) Controlled Substances Act

Part D — Offenses and Penalties

§841. Prohibited acts A

(a) Unlawful acts

Except as authorized by this subchapter, it shall be unlawful for any person knowingly or intentionally—

(1) to manufacture, distribute, or dispense, or possess with intent to manufacture, distribute, or dispense, a controlled substance; or

(2) to create, distribute, or dispense, or possess with intent to distribute or dispense, a counterfeit substance.

b) Penalties

Except as otherwise provided in section 849, 859, 860, or 861 of this title, any person who violates subsection (a) of this section shall be sentenced as follows:

(1)(A) In the case of a violation of subsection (a) of this section involving—

(i) 1 kilogram or more of a mixture or substance containing a detectable amount of heroin;

(ii) 5 kilograms or more of a mixture or substance containing a detectable amount of—

(I) coca leaves, except coca leaves and extracts of coca leaves from which cocaine, ecgonine, and derivatives of ecgonine or their salts have been removed;

(II) cocaine, its salts, optical and geometric isomers, and salts of isomers;

(III) ecgonine, its derivatives, their salts, isomers, and salts of isomers; or

(IV) any compound, mixture, or preparation which contains any quantity of any of the substances referred to in subclauses (I) through (III);

(iii) 280 grams or more of a mixture or substance described in clause (ii) which contains cocaine base;

(iv) 100 grams or more of phencyclidine (PCP) or 1 kilogram or more of a mixture or substance containing a detectable amount of phencyclidine (PCP);

(v) 10 grams or more of a mixture or substance containing a detectable amount of lysergic acid diethylamide (LSD);

(vi) 400 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide or 100 grams or more of a mixture or substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide;

(vii) 1000 kilograms or more of a mixture or substance containing a detectable amount of marihuana, or 1,000 or more marihuana plants regardless of weight; or

(viii) 50 grams or more of methamphetamine, its salts, isomers, and salts of its isomers or 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers;

such person shall be sentenced to a term of imprisonment which may not be less than 10 years or more than life and if death or serious bodily injury results from the use of such substance shall be not less than

20 years or more than life, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$10,000,000 if the defendant is an individual or \$50,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment which may not be less than 20 years and not more than life imprisonment and if death or serious bodily injury results from the use of such substance shall be sentenced to life imprisonment, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$20,000,000 if the defendant is an individual or \$75,000,000 if the defendant is other than an individual, or both. If any person commits a violation of this subparagraph or of section 849, 859, 860, or 861 of this title after two or more prior convictions for a felony drug offense have become final, such person shall be sentenced to a mandatory term of life imprisonment without release and fined in accordance with the preceding sentence. Notwithstanding section 3583 of title 18, any sentence under this subparagraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least 5 years in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 10 years in addition to such term of imprisonment. Notwithstanding any other provision of law, the court shall not place on probation or suspend the sentence of any person sentenced under this subparagraph. No person sentenced under this subparagraph shall be eligible for parole during the term of imprisonment imposed therein.

(B) In the case of a violation of subsection (a) of this section involving—

- (i) 100 grams or more of a mixture or substance containing a detectable amount of heroin;
- (ii) 500 grams or more of a mixture or substance containing a detectable amount of—
 - (I) coca leaves, except coca leaves and extracts of coca leaves from which cocaine, ecgonine, and derivatives of ecgonine or their salts have been removed;
 - (II) cocaine, its salts, optical and geometric isomers, and salts of isomers;
 - (III) ecgonine, its derivatives, their salts, isomers, and salts of isomers; or
 - (IV) any compound, mixture, or preparation which contains any quantity of any of the substances referred to in subclauses (I) through (III);
- (iii) 28 grams or more of a mixture or substance described in clause (ii) which contains cocaine base;
- (iv) 10 grams or more of phencyclidine (PCP) or 100 grams or more of a mixture or substance containing a detectable amount of phencyclidine (PCP);
- (v) 1 gram or more of a mixture or substance containing a detectable amount of lysergic acid diethylamide (LSD);
- (vi) 40 grams or more of a mixture or substance containing a detectable amount of N-phenyl-N- [1- (2-phenylethyl) -4-piperidinyl] propanamide or 10 grams or more of a mixture or substance containing a detectable amount of any analogue of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide;
- (vii) 100 kilograms or more of a mixture or substance containing a detectable amount of marihuana, or 100 or more marihuana plants regardless of weight; or
- (viii) 5 grams or more of methamphetamine, its salts, isomers, and salts of its isomers or 50 grams or more of a mixture or substance containing a detectable amount of methamphetamine, its salts, isomers, or salts of its isomers;

such person shall be sentenced to a term of imprisonment which may not be less than 5 years and not more than 40 years and if death or serious bodily injury results from the use of such substance shall be not less than 20 years or more than life, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$5,000,000 if the defendant is an individual or \$25,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment which may not be less than 10 years and not more than life imprisonment and if death or serious bodily injury results from the use of such substance shall be sentenced to life imprisonment, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$8,000,000 if the defendant is an individual or \$50,000,000 if the defendant is other than an individual, or both. Notwithstanding section 3583 of title 18, any sentence imposed under this subparagraph shall, in the absence of such a prior conviction, include a term of supervised release of at least 4 years in addition to such term of imprisonment and shall, if there was such a prior conviction, include a term of supervised release of at least 8 years in addition to such term of imprisonment. Notwithstanding any other provision of law, the court shall not

place on probation or suspend the sentence of any person sentenced under this subparagraph. No person sentenced under this subparagraph shall be eligible for parole during the term of imprisonment imposed therein.

(C) In the case of a controlled substance in schedule I or II, gamma hydroxybutyric acid (including when scheduled as an approved drug product for purposes of section 3(a)(1)(B) of the Hillory J. Farias and Samantha Reid Date-Rape Drug Prohibition Act of 2000), or 1 gram of flunitrazepam, except as provided in subparagraphs (A), (B), and (D), such person shall be sentenced to a term of imprisonment of not more than 20 years and if death or serious bodily injury results from the use of such substance shall be sentenced to a term of imprisonment of not less than twenty years or more than life, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$1,000,000 if the defendant is an individual or \$5,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 30 years and if death or serious bodily injury results from the use of such substance shall be sentenced to life imprisonment, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$2,000,000 if the defendant is an individual or \$10,000,000 if the defendant is other than an individual, or both. Notwithstanding section 3583 of title 18, any sentence imposing a term of imprisonment under this paragraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least 3 years in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 6 years in addition to such term of imprisonment. Notwithstanding any other provision of law, the court shall not place on probation or suspend the sentence of any person sentenced under the provisions of this subparagraph which provide for a mandatory term of imprisonment if death or serious bodily injury results, nor shall a person so sentenced be eligible for parole during the term of such a sentence.

(D) In the case of less than 50 kilograms of marihuana, except in the case of 50 or more marihuana plants regardless of weight, 10 kilograms of hashish, or one kilogram of hashish oil, such person shall, except as provided in paragraphs (4) and (5) of this subsection, be sentenced to a term of imprisonment of not more than 5 years, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$250,000 if the defendant is an individual or \$1,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 10 years, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$500,000 if the defendant is an individual or \$2,000,000 if the defendant is other than an individual, or both. Notwithstanding section 3583 of title 18, any sentence imposing a term of imprisonment under this paragraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least 2 years in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 4 years in addition to such term of imprisonment.

(E)(i) Except as provided in subparagraphs (C) and (D), in the case of any controlled substance in schedule III, such person shall be sentenced to a term of imprisonment of not more than 10 years and if death or serious bodily injury results from the use of such substance shall be sentenced to a term of imprisonment of not more than 15 years, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$500,000 if the defendant is an individual or \$2,500,000 if the defendant is other than an individual, or both.

(ii) If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 20 years and if death or serious bodily injury results from the use of such substance shall be sentenced to a term of imprisonment of not more than 30 years, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$1,000,000 if the defendant is an individual or \$5,000,000 if the defendant is other than an individual, or both.

(iii) Any sentence imposing a term of imprisonment under this subparagraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least 2 years in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 4 years in addition to such term of imprisonment.

(2) In the case of a controlled substance in schedule IV, such person shall be sentenced to a term of imprisonment of not more than 5 years, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$250,000 if the defendant is an individual or \$1,000,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 10 years, a fine not to exceed the greater of twice that authorized in

accordance with the provisions of title 18 or \$500,000 if the defendant is an individual or \$2,000,000 if the defendant is other than an individual, or both. Any sentence imposing a term of imprisonment under this paragraph shall, in the absence of such a prior conviction, impose a term of supervised release of at least one year in addition to such term of imprisonment and shall, if there was such a prior conviction, impose a term of supervised release of at least 2 years in addition to such term of imprisonment.

(3) In the case of a controlled substance in schedule V, such person shall be sentenced to a term of imprisonment of not more than one year, a fine not to exceed the greater of that authorized in accordance with the provisions of title 18 or \$100,000 if the defendant is an individual or \$250,000 if the defendant is other than an individual, or both. If any person commits such a violation after a prior conviction for a felony drug offense has become final, such person shall be sentenced to a term of imprisonment of not more than 4 years, a fine not to exceed the greater of twice that authorized in accordance with the provisions of title 18 or \$200,000 if the defendant is an individual or \$500,000 if the defendant is other than an individual, or both. Any sentence imposing a term of imprisonment under this paragraph may, if there was a prior conviction, impose a term of supervised release of not more than 1 year, in addition to such term of imprisonment.

(4) Notwithstanding paragraph (1)(D) of this subsection, any person who violates subsection (a) of this section by distributing a small amount of marihuana for no remuneration shall be treated as provided in section 844 of this title and section 3607 of title 18.

(5) Any person who violates subsection (a) of this section by cultivating or manufacturing a controlled substance on Federal property shall be imprisoned as provided in this subsection and shall be fined any amount not to exceed—

- (A) the amount authorized in accordance with this section;
 - (B) the amount authorized in accordance with the provisions of title 18;
 - (C) \$500,000 if the defendant is an individual; or
 - (D) \$1,000,000 if the defendant is other than an individual;
- or both.

(6) Any person who violates subsection (a) of this section, or attempts to do so, and knowingly or intentionally uses a poison, chemical, or other hazardous substance on Federal land, and, by such use—

- (A) creates a serious hazard to humans, wildlife, or domestic animals,
 - (B) degrades or harms the environment or natural resources, or
 - (C) pollutes an aquifer, spring, stream, river, or body of water,
- shall be fined in accordance with title 18 or imprisoned not more than five years, or both.

(7) Penalties for distribution.—

(A) In general.—Whoever, with intent to commit a crime of violence, as defined in section 16 of title 18 (including rape), against an individual, violates subsection (a) of this section by distributing a controlled substance or controlled substance analogue to that individual without that individual's knowledge, shall be imprisoned not more than 20 years and fined in accordance with title 18.

(B) Definition.—For purposes of this paragraph, the term "without that individual's knowledge" means that the individual is unaware that a substance with the ability to alter that individual's ability to appraise conduct or to decline participation in or communicate unwillingness to participate in conduct is administered to the individual.

SCHOOL SANCTIONS **

(APPLIED TO ALL CATEGORIES OF SUBSTANCES)

STUDENTS

All students are expected to be familiar with and to adhere to federal, state, and local laws and university policies with regard to the use and possession of drugs or alcohol. The University will impose sanctions for violation of the standards of behavior (on and off campus) consistent with local and federal laws, and University policies. Violations will result in disciplinary action, up to and including dismissal, and referral for possible prosecution. Sanctions imposed will depend upon the severity and frequency of the violation. In addition to, or in lieu of discipline, violators may be required to complete an appropriate rehabilitation program.

Applicable sanctions include, but are not limited to, probation, probation and referral for treatment and rehabilitation (without adjudication), suspension, or non-academic dismissal. The University may refer any case to the proper local, state and/or federal authorities for appropriate legal action. Individuals disciplined under the University Policy on Substance and Alcohol Abuse have the right to an appeal in accordance with applicable University grievance procedures.

Persons convicted of drug possession under US Federal law are ineligible for federal student grants and loans for up to one year after the first conviction, five years after the second; the penalty for distributing drugs is loss of benefits for five years after the first conviction, ten years after the second, permanently after the third conviction.

The University sanctions imposed under the Policy on Substance and Alcohol Abuse neither diminish nor replace the penalties available under generally applicable civil or criminal laws. Violations of University standards may also violate federal, state and local laws, or other appropriate governance body. Violators will be subject to all appropriate penalties within the jurisdiction of the offense.

FACULTY AND STAFF

Colleagues of the institution are prohibited from:

- Possession, use or sale of illegal drugs or substances
- Possession on organization premises of open containers of alcoholic beverages, or drinking on the premises, except at organization-approved events
- Providing alcoholic beverages to underage students

Sanctions for this violation could lead up to termination of employment.

******These sanctions are in addition to any criminal sanctions that may be imposed. Student colleagues are subject to both colleague and student sanctions.

LOCAL TREATMENT RESOURCES

The following is a sampling of local area information and treatment resources. A more comprehensive listing of available counseling and treatment programs can be obtained in the Student Central.

RUSM, Barbados, Counseling Centre: 1-246-627-8016/245-1622 (On-call)
National Counsel on Substance Abuse: 1-246-535-6272

STUDENT CODE OF CONDUCT

The Code of Conduct applies to any covered person as that term is defined in the Code.

TERMINOLOGY

1. The terms “University” or “RUSM” means Ross University School of Medicine.
2. The term “covered person” includes any person taking courses (either full-time or part-time, either onsite or online, and including but not limited to students who take time off between terms), receiving or seeking to receive services from the University, or otherwise pursuing undergraduate, graduate or professional studies at the University.
3. The term “faculty member” means any person hired by or contracted with the University to conduct instructional activities.
4. The term “Staff” means any person employed by the University.
5. The term “member of the RUSM community” includes students, faculty members or staff, and any other individuals associated with the University. The conduct administrator shall determine a person’s status in a particular situation.
6. The term “Complaint,” shall mean a written statement submitted by a member of the

7. The term “RUSM premises” includes all land, buildings, facilities, student housing and other property in the possession of or owned, used, or controlled by the University (including parking lots, adjacent streets and sidewalks).
8. The term “conduct panel” means any person or persons authorized by the conduct administrator or authorized designee to determine whether a respondent has violated the Code of Conduct and to impose sanctions. For students in the Medical Sciences curriculum, the conduct panel is the Grievance Committee, composed of appointed faculty. For students in clinical semesters, the only conduct panel is the Grievance Committee.
9. The term “conduct administrator” means an RUSM official authorized by the University to manage Code of Conduct proceedings and/or impose sanctions upon respondents found to have violated the Code of Conduct. A conduct administrator may serve simultaneously as a conduct administrator, and as the sole member or one of the members of the conduct panel. Nothing shall prevent the University from authorizing the same conduct administrator to impose sanctions in all cases at a particular location or locations.
10. The term “policy” is defined as the policies, rules and procedures of the University including, but not limited to, those found in this Student Handbook, and academic catalogs.
11. The term “organization” means any number of persons who have complied with the formal requirements for University recognition/registration as an organization.

CONDUCT ADMINISTRATOR AND CONDUCT PANEL

- 1) The conduct administrator shall determine the composition of conduct panels and determine which conduct panel shall be authorized to hear each case. Where a multi-person panel is used instead of hearing by a conduct administrator, the conduct panels shall include, at minimum, three eligible members of the RUSM community.
 - a. The Honor Council may review Complaints between students or by administration that occur either on or off campus.
 - b. The following types of complaints may not be referred to the Honor Council: (1)
 - i. Complaints that arise under the Non-Discrimination policy; (2)
 - ii. Complaints that allege any violations of the Sexual Misconduct Policy; or(3)
 - iii. Complaints concerning acts of academic misconduct.
 - c. The Honor Council may facilitate mediation on covered matters and issue non-binding resolutions that have been mutually agreed upon by the Parties.
 - i. All Parties to the Complaint must agree in order for the resolution to be implemented and as such is not subject to appeal.
 - d. The Honor Council may not impose disciplinary actions.
 - e. At its sole discretion, the Honor Council may also determine at any point in the process of hearing a Complaint, that the Complaint should be referred to a Grievance Committee or conduct administrator.
 - i. In cases in which a multi-person panel is used, the recommendation of all members of the conduct panel, referred to as the Grievance Committee, shall be considered by the conduct administrator. Following the hearing, the conduct administrator or designee shall advise the respondent in writing of the determination, the sanction(s) imposed, if any, and appeal procedures
 - f. The Grievance Committee may hear any type of matter and may impose any type of disciplinary action, up to and including expulsion non-academic dismissal from RUSM.
 - g. The decision of the Grievance committee is binding, unless overturned on appeal.
- 2) The conduct administrator shall develop procedures for administration of the Code of Conduct and for conducting hearings which are consistent with the provisions of this Code of Conduct.
- 3) Decisions made by a Grievance Committee and/or conduct administrator shall be final, pending the appeal process.
- 4) In appropriate situations, the Grievance Committee and/or conduct administrator may also provide a respondent who is subject to the hearing process with referral information for external counseling or other services available within the greater community that may help the respondent to ameliorate his/her/their conduct to prevent further violations of the Code of Conduct.

PROSCRIBED CONDUCT

Scope or Purview

The Code of Conduct applies to behavior that affects the RUSM community, irrespective of where or when that conduct may occur. Discipline may extend to off-campus activities and locations (including but not limited to

off-campus activities, events, and housing) when the actions in question adversely affect the RUSM community and/or pursuit of its objectives.

Conduct – Rules and Regulations

Any respondent found to have committed misconduct, including the following types of misconduct, may be subject to disciplinary sanctions outlined in Sanctions.

- 1) Acts of dishonesty including, but not limited to, the following:
 - a) Furnishing false information to any University official, faculty member or office.
 - b) Forgery, alteration or misuse of any University document, record or instrument of identification.
 - c) Computer piracy, including duplication of computer software, copyright infringement and unauthorized computer entry.
- 2) Disruption or obstruction of teaching, research, administration, disciplinary proceedings and other University activities, including its public service functions on or off campus, or other authorized non-University activities, when the act occurs on RUSM premises.
- 3) Physical abuse, verbal abuse, threats, intimidation, and harassment including, but not limited to, sexual harassment, coercion and/or other conduct that threatens or endangers the health or safety of any person, either on or off RUSM premises or at any University-sponsored activity.
- 4) Bullying and cyberbullying, which is using one's power to control or harm individuals who cannot defend themselves including, but not limited to, face-to-face interactions and any electronic communication (communication transmitted by means of an electronic device, including, but not limited to, a telephone, cellular phone, computer, or pager) whether it be a single incident or a series of incidents.
- 5) Attempted or actual theft of and/or damage to property of the University or property of a member of the RUSM community or other personal or public property.
- 6) RUSM specifically prohibits any organization, chartered or otherwise, officially or in fact, from participating in the activity of "hazing," defined as any action taken or situation created which, regardless of intent or consent of the participants, may reasonably produce bodily harm or danger, mental or physical discomfort, embarrassment, harassment, fright, humiliation or ridicule, or otherwise compromises the dignity of an individual; compels an individual to participate in an activity that is unlawful and or contrary to University rules, policies and regulations; will unreasonably or unusually impair an individual's academic efforts, and/or occurs on or off campus. Hazing is further defined as an act that endangers the mental or physical health or safety of a student, or removes public or private property, for the purpose of initiation or admission into, affiliation with, or as a condition for, continued membership in a group or organization. Such activities and/or actions prohibited include, but are not limited to: tests of endurance; submission of members or prospective members to potentially dangerous or hazardous circumstances; any activity that by its nature is so intense that it would cause severe mental anxiety, mental distress, panic, human degradation or public embarrassment; creation of excessive fatigue or a late work session that interferes with scholastic activities or deprives persons of the opportunity for sufficient sleep (six hours per day), decent edible meals and/or access to means of bodily cleanliness; forcing or coercing a person to consume alcohol or other substances, in any amount; any requirement that compels an individual to participate in an activity that is illegal, perverse or indecent; and compelling individuals to engage in sexual behaviors, sexual or racial harassment or slurs, or exhibitionism.
- 7) Violation of conduct guidelines, including those in student leases and housing handbooks, applicable to University-controlled housing.
- 8) Gambling on RUSM premises, at University functions or through the use of University equipment.
- 9) Failure to comply with directions of University officials or law enforcement officers acting in performance of their duties and/or failure to identify oneself to these persons when requested to do so.
- 10) Unauthorized possession, duplication or use of keys, or unauthorized entry to or use of premises.
- 11) Violation of published University policies, procedures, rules or regulations.
- 12) Violation of any applicable federal, state or local law.
- 13) Use, possession or distribution of narcotics or other controlled substances, except as expressly permitted by law, a valid doctor's order, and the University, or being under the influence of such substances. Please note in particular that even where otherwise permitted under local law, marijuana or other psychotropic substance use, possession, or influence on University premises, at University events, or that adversely affects the RUSM community, is prohibited.
- 14) Use, possession or distribution of alcoholic beverages, except as expressly permitted by law and University regulation; or public intoxication. Use, possession or distribution of alcohol on any RUSM premise is prohibited.

- 15) Illegal or unauthorized possession of firearms, explosives, other weapons or dangerous chemicals.
- 16) Participation in a demonstration that disrupts normal operations of the University or infringes on rights of other members of the RUSM community; leading or inciting others to disrupt the scheduled and/or normal activities within any University building or area; intentional obstruction that is unreasonable and interferes with freedom of movement and/or free flow of pedestrian or vehicular traffic.
- 17) Conduct that is disorderly, disruptive, lewd or indecent; breach of peace; or aiding, abetting, or procuring another person to breach the peace.
- 18) Aiding, abetting, or inducing another to engage in behavior prohibited by the Code of Conduct.
- 19) Theft or other abuse of computer time, including but not limited to:
 - a) Unauthorized entry into a file, to use, read or change contents, or for any other purpose.
 - b) Unauthorized transfer of a file.
 - c) Unauthorized use of another individual's identification and password.
 - d) Use of computing facilities to interfere with work of another student, faculty member or University official.
 - e) Use of computing facilities to send obscene or abusive messages.
 - f) Use of computing facilities to interfere with normal operation of the University computing system.
 - g) Introduction, reproduction and/or promulgation of any computer virus.
- 20) Abuse of the disciplinary system, including, but not limited to:
 - a) Falsification, distortion or misrepresentation of information before a conduct administrator and/or conduct panel.
 - b) Disruption or interference with orderly conduct of a conduct proceeding.
 - c) Knowingly instituting complaint or conduct proceedings without good cause.
 - a. Attempting to discourage an individual's proper participation in, or use of, the complaint or conduct procedures.
 - d) Attempting to influence the impartiality of a member of a conduct panel prior to, and/or during, the course of the conduct proceeding.
 - e) Harassment (verbal or physical) and/or intimidation by a student of a participant in the conduct or complaint processes prior to, during and/or after a conduct proceeding.
 - f) Failure to comply with sanction(s) imposed under the Code of Conduct.
 - g) Influencing or attempting to influence another person to commit an abuse of the conduct or complaint procedures.
- 21) Cheating: Any intentional misrepresentation of another's work as one's own or a misrepresentation of the circumstances under which the work was done. This violation includes, but is not limited to, copying, plagiarism, unauthorized collaboration and unauthorized divulging of test contents or the violation of any academic and Exam Center policies pertaining to the exam process.
- 22) Toleration: Failure of a student to report acts of dishonesty, cheating or other proscribed conduct may be viewed as a violation of the Code of Conduct.
- 23) Conduct unbecoming of a medical professional: Any behavior deemed inappropriate of a medical professional that would otherwise reflect poorly upon RUSM and its representatives. This violation includes, but is not limited to, behavior in contradiction to the Technical Standards, behavior in contradiction to the AMA Code of Ethics, illegal use/possession/distribution/sale of drugs, public intoxication to a gross extent and public indecency. This is not an exhaustive list and may be evaluated on a case-by-case basis.

Involvement of Law Enforcement or External Judicial Authorities

Complainants who believe that they are victims of crime or other violation of law (for example, assault, battery, sexual misconduct) may notify and seek assistance from the University, local law enforcement and/or other community resources concurrently. The conduct administrator can provide information about how to contact local law enforcement or other local community resources.

The University is committed to maintaining an environment that is safe for all members of the RUSM community. Safety concerns, including those arising out of Code of Conduct proceedings, should be brought to the attention of the campus incident commander or the conduct administrator for evaluation of any appropriate measures to be taken by the University to promote security. Complainants may also seek protective, restraining, or "no-contact" orders from an

external law enforcement or judicial authority; complainants who do so should notify the conduct administrator or campus incident commander so that the University can cooperate as appropriate in the observation of the order.

The University may institute Code of Conduct proceedings against a respondent charged with violation of applicable law without regard to the pendency of civil litigation or criminal arrest and prosecution. Proceedings under this Code of Conduct may be carried out prior to, simultaneously with, or following civil or criminal proceedings. If a code of conduct violation is also a civil violation (e.g. rape), we may be obligated to report it to civil authorities, regardless of the victim's preference.

If the alleged violation of law is also the subject of Code of Conduct proceedings, the University may advise external authorities of the existence and status of the Code of Conduct proceedings. The University cooperates fully with law enforcement and other agencies in enforcing law on University property and in the conditions imposed by criminal courts for the protection of victims and the rehabilitation of violators. Individual students, staff, or faculty members, acting in their personal capacities, remain free to interact with a governmental representative or law enforcement official as they deem appropriate.

CONDUCT COMPLAINT AGAINST STUDENT – POLICY & PROCEDURES

Complaint and Hearings

- 1) Any member of the RUSM community or the University itself may make a report against any covered person alleging misconduct. Notice of a possible violation may result in complaints being filed by the University whether or not the impacted community member wishes to proceed. Complaints shall be prepared in writing and directed to the conduct administrator at the appropriate University location. Any complaint should be submitted as soon as possible after the event takes place.
- 2) Once complaints have been filed, the conduct administrator will investigate to determine if any of the allegations have merit.
 - a) If a complaint is found to not have merit it may be dismissed.
 - b) If a complaint is found to have merit, the conduct administrator may either:
 - i) Resolve the complaint informally by mutual consent of the complainant and the respondent on a basis acceptable to the conduct administrator (such as Honor Council mediation, Restorative Justice or other form of alternative dispute resolution). Mediation will not be used for complaints involving alleged sexual misconduct.
 - ii) Where there is no complainant, resolve the complaint informally on a basis acceptable to the conduct administrator including, but not limited to, written warning, educational resolutions, and/or sanctions outlined in the "Sanctions" section below.
 - iii) The conduct administrator may also issue a conduct warning to a respondent or complainant where a complaint is resolved by mutual consent.
 - iv) The conduct administrator may hold a hearing individually or refer the complaint to a conduct panel.
- 3) All formal complaints shall be presented to the respondent in writing. A hearing before a conduct panel (Honor Council or Grievance Committee) will be scheduled after receipt of the answer from the Respondent. If no answer to the complaint is submitted, the hearing will be scheduled following the deadline for submission (five [5] business days). The timeframe for scheduling of hearings is at the discretion of the conduct administrator.
- 4) The conduct administrator may choose to hold the hearing him/herself or may require a hearing by a conduct panel. If either the complainant or the respondent believes that a member of the conduct panel has a conflict of interest, they should bring this concern to the attention of the conduct administrator, or if the alleged conflict is held by the conduct administrator to the attention of the location's conduct administrator's manager.
- 5) Hearings shall be held according to the following guidelines:
 - a) Hearings shall be held in private. Admission of any person to the hearing shall be at the discretion of the conduct administrator or conduct panel chairperson.
 - b) In advance of the hearing, both the complainant and respondent will be given access to the identified information that is available before the hearing which will be considered by the conduct administrator or conduct panel.
 - c) The complainant and respondent have the right to be assisted by any advisor they choose, at their own expense. The advisor may be an attorney. The complainant and respondent are responsible for presenting their own case and, therefore, advisors are not permitted to participate directly in any hearing before a conduct administrator or conduct panel.
 - d) The University, the complainant, the respondent and the conduct administrator or conduct panel shall be allowed to present witnesses, subject to the right of cross-examination by the conduct administrator or conduct panel.
 - e) Pertinent records, exhibits, and written statements may be accepted as evidence for consideration by a conduct panel at the discretion of the conduct administrator or conduct panel chairperson.
 - f) All procedural questions are subject to the final decision of the conduct administrator or conduct panel chairperson.

- g) After the hearing, the conduct panel shall deliberate in private and determine (by majority vote for a multi-person conduct panel) whether the respondent has violated the Code of Conduct.
- h) The conduct administrator or conduct panel's determination shall be made using the Preponderance of Evidence standard, defined as more likely than not that the respondent violated the Code of Conduct.
- 6) There shall be a single record of all hearings before a conduct panel or conduct administrator. The record shall be the property of the University. Suspensions and non-academic dismissals will be noted in the respondent's academic file.
- 7) No respondent may be found to have violated the Code of Conduct solely because the respondent failed to appear before a conduct panel. Even if the respondent does not appear, the evidence in support of the complaints shall be presented and considered. Likewise, a respondent may be found to have violated the Code of Conduct even in instances where the complainant has not participated in the conduct proceedings.
- 8) The conduct administrator or designee shall notify the respondent of the outcome in writing, and in appropriate cases, shall also notify the complainant. In specific types of cases, such as those of sexual misconduct allegations, the complainant and respondent will be informed simultaneously. Where safety concerns exist, the complainant may be given appropriate notice prior to formal notification.

Sanctions

Sanctions can be utilized in the matter of an informal resolution or a formal hearing. In the case of a formal hearing, sanctions are determined by the conduct panel final outcome of the hearing.

The sanctions listed below may be imposed upon any covered person found to have violated the Code of Conduct. The listing of the sanctions should not be construed to imply the covered person are entitled to progressive discipline. The sanctions may be used in any order and/or combination that the University deems appropriate for the conduct in question.

- a. There follows a list of the most commonly imposed sanctions, but RUSM may also choose to impose other sanctions, not listed here:
- b. Non-academic Probation – A written reprimand with stated conditions in effect for a designated period of time, including the probability of more severe disciplinary sanctions if the respondent does not comply with University policies or otherwise does not meet the University's conduct expectations during the probationary period.
- c. Restitution – Compensation for loss, damage or injury. This may take the form of appropriate service and/or monetary or material replacement.
- d. Housing Suspension – Separation of the respondent from their University-controlled housing for a defined period of time. Conditions for returning to housing may be specified.
- e. Housing Expulsion – Permanent separation of the respondent from University-controlled housing.
- f. RUSM Suspension – Separation of the respondent from the University for a defined period of time, after which the respondent may be eligible to return. Conditions for readmission may be specified.
- g. RUSM Non-Academic Dismissal – Permanent separation of the respondent from RUSM.
- h. Suspension of Services – Ineligibility to receive specified services or all RUSM services for a specified period of time, after which the respondent may regain eligibility. Conditions to regain access to services may be specified.
- i. Ineligibility for Services – Permanent ineligibility to receive specified or all RUSM services, and services from other RUSM Education Group institutions.
- j. Remediation – Such as counseling and education in the area of noncompliance. Participation in psycho-educational groups and/or assigned educational initiatives designed to assist the student towards compliance.
- k. Limiting Order – Restriction on a respondent's permission to be in the same proximity as the complainant and/or others, with the parameters of the restriction to be defined by the University (e.g., for use with allegations of sexual or other misconduct).
- l. Educational Response – An assignment (form may vary) with the intent of providing education relevant to the student's violation and/or needs.

More than one sanction listed above may be imposed for any single violation. In each case in which a conduct administrator or Grievance Committee determines that a respondent has violated the Code of Conduct, sanction(s) shall be determined and imposed by the conduct administrator. In cases in which a multi-person panel is used, the recommendation of all members of the conduct panel shall be considered by the conduct administrator and the decision should be made by majority vote.

Following the hearing, the conduct administrator or designee shall advise the respondent in writing of the determination, the sanction(s) imposed, if any, and appeal procedures. In appropriate cases (e.g., allegations involving certain types of sexual misconduct), the conduct administrator, or designee will also simultaneously provide the complainant with written notice of the outcome and appeal procedures.

Interim Measures

In certain circumstances, the University may impose a RUSM and/or housing interim suspension or No Contact Order (NCO).

Interim suspension may be imposed:

- a. to ensure the safety and well-being of members of the RUSM community or preservation of University property; or
- b. if the University deems that the respondent poses a threat of disruption of or interference with the normal operation of the University
- a. During the interim suspension, the respondent may be denied access to RUSM premises (including online and onsite classes) and/or all other University activities or privileges for which the respondent might otherwise be eligible, as the University may determine to be appropriate. In appropriate cases, the University may notify the complainant of a respondent's interim suspension status.

An NCO can be put in place by the conduct administrator, or designee, between covered persons in order to:

- 2) De-escalate conflict.
- 3) Assist covered persons in refraining from actions that could be considered a violation of the Code of Conduct.
- 4) Address concerns raised as part of a sexual misconduct investigation.
- 5) NCO shall not be lifted on the request of the complainant and/or respondent. However, an NCO may be lifted with mutual consent by the complainant and the respondent.
- 6) If any party (complainant or respondent) is found to be in violation of "No Contact Order", it will be considered as breach of code of conduct and appropriate disciplinary sanction, up to, but not limited to, suspension/dismissal from the University will be imposed.

Lifting of Non-academic Probation: Non-academic probation is lifted after the time period specified, when a) no further violations are committed; and b) all terms specified in the disciplinary decision have been successfully completed.

- **Student file:** This period of non-academic probation is documented in the student file as Disciplinary Probation. Upon completion of the terms of this probationary period, a student may request that the non-academic probation be noted as successfully completed. Students are encouraged to document all efforts taken to address any cited violation and confirm that this documentation is preserved in their student files.
- **Financial Aid:** Unlike Academic Probation, periods of Non-Academic Probation will not impact a student's eligibility for or status regarding financial aid.

Lifting of Interim Sanctions: Interim Sanctions are lifted following the issuance of a formal or informal disciplinary decision (which may result in a further Suspension sanction) or a successful appeal to a decision. An interim sanction may also be lifted following the assessment of new information. Where conditions are placed upon a student's return, those conditions must be approved and verified as fully completed before the student will be allowed to register for a future semester.

- **Student File:** An Interim Sanction may impact the student's transcript. The designation for the missed time on the transcript is determined by the conduct administrator in consultation with the Office of the Registrar on a case-by-case basis, following the determination reached by an informal resolution or formal hearing. If designated as a suspension, it will appear in the student's educational file as non-academic suspension. Students are encouraged to document efforts taken to address a cited violation.
- **Financial Aid:** Eligibility for financial aid may be impacted depending upon the length of an Interim Sanction, and whether it transitions to a suspension sanction following disciplinary action. Students are required to comply with all financial aid repayment obligations during a suspension.

Lifting of Suspension: Where conditions are placed upon a student's return, those conditions must be certified as fully completed before the student will be eligible to register for a future semester. The completion/fulfillment of conditions shall be verified and approved by the conduct administrator. A suspended student, upon return to campus, will be on automatic disciplinary probation for either a designated period of time, identified at the time the original sanction is issued, or until graduation from RUSM.

- **Student File:** A suspension will appear in the student's educational file as Non-academic Suspension. Students are encouraged to document efforts taken to address a cited violation.
- **Financial Aid:** Students are required to comply with all financial aid repayment obligations during a suspension.
- **NOTE:** Failure to comply with the limitations of any suspension or disciplinary probation may result in extended suspension or permanent non-academic dismissal.

Non-Academic Dismissal: Non-academic dismissal means permanent termination of student status. A dismissed student is no longer permitted to attend RUSM or any of its affiliated institutions. A student dismissed on disciplinary grounds is not eligible for re-admission.

- 1) **Student File:** A record of this disciplinary action will be placed in the student's file.
- 2) **Financial Aid:** All financial aid repayment obligations apply.

Records of Sanctions

Any sanctions imposed are recorded in the student's disciplinary file, and, where appropriate, also noted in permanent educational records. Information regarding probations, suspensions and non-academic dismissals are readily available to RUSM officials as needed to assure administrative compliance with those sanctions.

In the event a student withdraws or is dismissed prior to the disposition of a disciplinary action, documentation of a pending disciplinary case without final determination will be included as part of the student's educational record. Should the student return, the disciplinary review would proceed accordingly.

Notifications during Suspensions/Non-Academic Dismissals

RUSM may be obligated to take into account the interest of the following parties when resolving a disciplinary matter:

- **Immigration:** In those situations in which a student is not a citizen of the country where the study of medicine is occurring, RUSM may be obligated to inform immigration authorities of changes to a student's enrollment status following a non-academic dismissal or suspension. A student who has been suspended or dismissed may no longer be entitled to the status of a legal resident.
- **Complainants and Victims:** Regarding access to sensitive information during a disciplinary action, RUSM will balance the interests of privacy and other legal rights of the respondent with those of victims and complainants.
- **Legal Authorities:** RUSM may be obligated to disclose information as required to legal authorities, when disciplinary action uncovers evidence of conduct in violation of the law.
- **State Medical Boards, ECFMG, FCVS, Government Agencies, and Employers:** RUSM may be called upon to report unusual circumstances that may have occurred during the course of a student's medical education.

Appeals

- 1) A decision of a violation of the Code of Conduct and the sanctions reached by the conduct panel or imposed by the conduct administrator may be appealed by the respondent or complainant when applicable (see SEX AND GENDER-BASED MISCONDUCT RESPONSE AND PREVENTION policy) to the person identified in the determination letter within 7 calendar days of the date of the appealing party's receipt of the determination letter. Such appeals shall be sent via email to ConductAppeals@Rossu.edu. The results of the appeal to the person identified in the determination letter shall be final.
 - a. Except as required to explain the basis of new evidence, an appeal shall be limited to review of the hearing record of the initial hearing and documents considered by the conduct administrator or conduct panel for one or more of the following purposes:
 - To determine whether the original hearing was administered fairly in light of the complaints and evidence presented and in substantial conformity with prescribed procedures, giving the complainant a reasonable opportunity to prepare and present evidence that the Code of Conduct was violated, and giving the respondent a reasonable opportunity to prepare and present a rebuttal of those allegations.
 - To determine whether the decision reached regarding the respondent was based on reasonable evidence; that is, without substituting its judgment for that of conduct panel or the conduct administrator, the appellate decision-maker shall consider whether the facts in the case were reasonably sufficient to establish that a violation of the Code of Conduct occurred.
 - To determine whether the sanction(s) imposed were reasonably appropriate for the violation of the Code of Conduct the respondent was found to have committed.
 - To consider new evidence sufficient to alter the decision or sanction which was not brought out in the original hearing because such evidence was not known or available to the person appealing at the time of the original hearing.

The person ruling on the appeal shall notify in writing the complainant and respondent of the outcome of the appeal. If the appeal is granted, the matter can be remanded to the conduct panel (either the original panel or a new panel, as determined to be appropriate by the person considering the appeal) or the conduct administrator for action to be taken in response to the appeal findings.

If the appeal is denied, then the decision of the original conduct proceeding is upheld and final.

CONFIDENTIALITY AND PROHIBITION ON RETALIATION

Confidentiality

RUSM wishes to foster an environment in which individuals feel free to raise and discuss concerns. RUSM understands that complainants, respondents, witnesses, and others involved in the investigation process and conduct proceedings may be concerned about the confidentiality of information they are sharing.

In some cases, RUSM may be obligated to take action when it becomes aware of information relating to a complaint. Confidentiality will be maintained to the extent possible and consistent with RUSM's obligations in investigating complaints and addressing conduct appropriately. While the confidentiality of information received, the privacy of individuals involved, and compliance with the wishes of the complainant or witnesses cannot be guaranteed, they will be respected to the extent possible and appropriate. In particular, when possible and consistent with applicable law, personally identifying information about victims of sexual misconduct will be kept confidential as it appears in the University's publicly available record-keeping.

Retaliation

RUSM prohibits retaliation against anyone who reports an incident of alleged harassment, discrimination or other unlawful conduct, or any person who assists or participates in a proceeding, investigation or hearing relating to such allegations.

Retaliation includes, but is not limited to, any form of intimidation, reprisal, or harassment. All complaints of retaliation should be reported in accordance with the student complaint procedure available in this Student Handbook. If following the student complaint procedure would result in the student being required to submit their complaint to the person whom they believe is retaliating against him or her, the student may submit the retaliation complaint to the Conduct Administrator, who will determine an appropriate party to address the retaliation complaint.

Submission of a good-faith complaint or report of harassment, discrimination or other unlawful conduct will not adversely affect the complainant's future grades, learning, or academic environment. RUSM will discipline or take appropriate action against anyone who retaliates against any person who reports an incident of alleged harassment, discrimination, or other unlawful conduct, or who retaliates against any person who testifies, assists or participates in a conduct proceeding, investigation or hearing related to such allegations.

Campus Safety and Security

A truly safe campus can only be achieved through the cooperation of students, faculty, and staff. As members of this academic community, students must report crimes, suspicious activities, or other emergencies on campus to the Department of Security and Emergency Management. Students who witness or are victims of a crime affecting the RUSM community should immediately report the incident to local law enforcement in the community, in which the campus is located, and to the Office of Student Affairs or to the chief location administrator. RUSM will investigate such crimes and, when appropriate, bring them to the attention of the conduct administrator and other University officials such as the Title IX Coordinator.

Given public concern about escalating incidents of school violence, the University will take appropriate administrative action to protect the community. Student behavior that causes campus safety or security concerns will typically be addressed pursuant to the Interim Suspension provisions of the Code of Conduct. Accordingly, immediate suspension and eventual non-academic dismissal may result for students who:

- Possess, sell or otherwise furnish a firearm illegally or on at any time on RUSM premises or at RUSM events
- Brandish a knife at another person
- Sell, purchase or otherwise attempt to obtain a controlled substance
- Commit or attempt to commit a sexual assault or sexual battery
- Possess an explosive
- Cause serious physical injury to another person, except in self-defense
- Possess any knife (excludes pen knives or nail files) or other dangerous object of no reasonable use
- Unlawfully possess any controlled substance
- Commit robbery or extortion
- Commit assault or battery

Nothing in this policy should be construed as limiting or preventing the University's discretion to take other action which, in the University's sole discretion is necessary or advisable to promote campus safety and security.

RUSM takes seriously any threats made to cause harm to others or to oneself. Threats to harm others will be handled through the Code of Conduct and may involve an interim suspension and/or the engagement of law enforcement officials until conduct proceedings are completed. In the case of threats to harm oneself, the University may call local law enforcement officials or other persons acquainted with the person making the threat for the purposes of checking on that person's welfare. The University may also work with the person to determine available resources and appropriate next steps.

HONOR SYSTEM

The Concept of Honor at RUSM

The Honor System at RUSM is a deeply cherished obligation founded upon the personal integrity of each individual member of the RUSM community. It requires that all members of this community conduct themselves honorably at all times and in all dealings with others. This shared commitment to high ethical standards creates an atmosphere of trust and respect vital to the unique sense of community, which characterizes the institution.

Authority for the maintenance and operation of the Code of Conduct is delegated directly by the Board of Trustees to the students through the Dean with concurrence of the faculty. It is the conduct administrator's responsibility to determine or appoint a student body to determine when a breach of honor has been committed, and it is the students who are entrusted with helping to enforce the system. Accordingly, every member of the student body has the responsibility, not only for understanding the provisions of the Code of Conduct, but also for maintaining at all times the highest possible degree of personal integrity. Moreover, every student must realize that acceptance of admission to RUSM includes the explicit agreement to abide by the provisions of the Code of Conduct.

The presence of the Code of Conduct and its provisions does not in any way abridge or subrogate the responsibilities of the faculty in monitoring the student body in all areas herein identified, and in bringing actions through previously adopted mechanisms if incidents occur which are not brought to the attention of RUSM.

THE HONOR SYSTEM

The Honor System applies to every student who is enrolled at RUSM. Accordingly, every student shall be required to verify acceptance of the Honor System by signing the following Honor Pledge:

"As a student at RUSM, I, (student name), do hereby accept the Honor System. I have received the Student Handbook and am fully aware of the Code of Conduct contained within. I agree to read and become familiar with the Code of Conduct. Accordingly, I resolve to refrain from conducting myself in a manner that is unbecoming of a medical professional. I acknowledge that, in support of the Honor System, it is my responsibility to report any violations of the Code of Conduct. I understand that with any violation of the Code of Conduct, a plea of ignorance will not be acceptable, and the violation may result in my permanent non-academic dismissal from RUSM. I pledge that I shall endeavor at all times to create a spirit of honor of my chosen profession by upholding the Honor System myself and helping others to do the same."

Registration as a student at RUSM is not complete until signed verification of the Honor Pledge is on file, and no grades can be recorded until this is done. If the Pledge is not signed by the end of the fourth week of the semester, the student's matriculation may be cancelled and all fees paid will be forfeited in accordance with the withdrawal policy described in the Academic Catalog. The ultimate responsibility for signing the Honor Pledge rests with each individual student. During orientation, students receive a link to the Student Handbook and this pledge by incorporation. The most up to date version of the student handbook along with this pledge is available online at <https://medical.rossu.edu/>.

STUDENT COMPLAINT POLICY AND PROCEDURES

RUSM is deeply committed to creating a productive learning environment free from harassment or discrimination and which provides students appropriate resources and support. In keeping with that commitment, RUSM has developed this Student Complaint Against University, which is intended to advise students on how to raise and resolve any complaints or issues with RUSM, including (by way of illustration only) such diverse topics as dissatisfaction with services provided at a campus or clinical location, or discrimination or harassment in violation of RUSM's policies. Students are expected to adhere to this policy when raising complaints against RUSM or any RUSM colleague.

Students who wish to file a complaint regarding a fellow student's conduct should consult the Code of Conduct section found in this Student Handbook and may file a complaint by contacting the conduct administrator within the office of Student Affairs.

RUSM takes complaints very seriously and expects students to use good judgment in raising and attempting to resolve a complaint. Students are expected to adhere to the Conduct at all times; raising a complaint that contains false allegations or for an improper

purpose, such as to gain an unfair advantage academically, will be deemed a violation of the Honor Code and/or Code of Conduct and may subject the student to disciplinary action.

RUSM also reminds students that, as physicians in training, they are expected to adhere to a set of Technical Standards, which includes social skills such as problem solving and the ability to work as an effective member of a team. Accordingly, RUSM expects that students will attempt to resolve conflicts in a mature and appropriate manner, while being respectful of, and attempting to maintain a collegial relationship with, those involved. In most circumstances, and in keeping with the Technical Standards, RUSM expects students to attempt to resolve their complaints informally and through respectful discourse as outlined below. RUSM acknowledges, however, that not all complaints are amenable to informal resolution, including but not limited to complaints involving sexual harassment, discrimination or other serious allegations of misconduct by an RUSM colleague. Further, because no policy is one-size-fits-all, though, RUSM reserves the right to deviate from this policy if the circumstances of a particular complaint call for additional flexibility.

Informal Complaint Process

This initial process is followed to attempt to resolve the matter orally or in writing with the individual(s) most directly connected to the student's complaint. If the student is not comfortable discussing the matter with the individuals most directly involved, the student may take their informal complaint to a liaison not directly involved, such as the student affairs Conduct Administrator. If a complaint pertains to the Conduct Administrator, contact the Assistant Dean, Student Affairs.

A complainant pursuing informal resolution of their complaint usually is not required to submit a written complaint to initiate the process. Under these informal procedures, the student may, at any time, elect to stop further action by withdrawing the complaint, subject to the confidentiality provisions noted below, and with the understanding that, depending on the nature of the allegations, RUSM may be obligated to investigate the complaint with or without the complainant's involvement.

Complaints addressed informally may not be investigated to the same degree as formal complaints. Mediation may be used as a method for resolving the complaint informally, but not all complaints are appropriate for mediation; for example, allegations of sexual assault typically are not appropriate for mediation.

Adopting informal procedures for addressing complaints does not mean that RUSM does not take these complaints seriously. Informal procedures simply provide an alternative method for addressing complaints, which are in keeping with RUSM's Technical Standards. The complainant can also decide to file a formal complaint as described below at any time.

Formal Complaint Process

If the informal procedure is not appropriate or does not yield a successful resolution, the student can file a formal complaint in the following manner:

When to File a Complaint

Complaints should be filed by the student as soon as possible and, in any case, within 15 days after the end of the semester or clerkship in which the concern arose. There is no deadline if the complaint stems from an act of sexual misconduct. It is the student's responsibility to raise a complaint in a timely manner such that corrective action, if appropriate, can be taken before the student suffers an adverse consequence such as a poor grade.

What to File

A formal complaint must be in writing and include the following:

- The complainant's name, student ID#, address, email address, and phone number.
- A complete description of the concern/issue – including date, location, and all individuals involved, or who witnessed or otherwise have knowledge of the events and circumstances giving rise to the complaint.
- A description of what efforts have been made to resolve the issue informally. (*Optional*)
- A statement of the resolution requested.
- Any reference to external source documents (security reports, police reports, physician notes, etc.)

If a student is hesitant or unwilling to put a complaint alleging discrimination, harassment (including sexual misconduct) or other unlawful conduct in writing, they are encouraged to discuss their concerns with the Assistant Dean, Student Affairs. Students may also contact Adtalem Global Education Title IX Coordinator directly regarding matters involving sexual harassment or sexual violence including relationship and domestic violence.

Where to File Complaint

The complaint shall be filed with the Assistant Dean, Student Affairs. The written complaint can be submitted electronically or in person.

If a complaint pertains to the Conduct Administrator or the Assistant Dean, Student Affairs, contact the Associate Dean of Student Affairs.

Notice of Receipt

Upon receipt of the formal complaint, the designated point of contact (Assistant Dean, Student Affairs) or their designee will identify the appropriate party to investigate and resolve the matter; typically, this will be a reported party's manager or the Human Resources Department. Through the course of the investigation, the designated point of contact or alternate may facilitate, for the investigating party, interviews, consultation and requests for information regarding issues from the complaining student and any other individuals believed to have relevant information, including faculty, staff, and other students.

Findings and Notification

Upon completion of the investigation, the designated point of contact will report the findings of the investigation as deemed appropriate and any proposed resolution to the complainant.

Appeal

Within seven calendar days of the issuance of the final report, the complainant may appeal to the Associate Dean, of Student Affairs. If an RUSM colleague is involved, the appeal will be to the Campus Dean or the Assistant Dean for Clinical Sciences. Appeals must be submitted in writing and must state a basis for the appeal. The basis on which a student may appeal are:

- There is new evidence that was unavailable at the time of the original investigation that would affect the outcome of the original decision.
- There were procedural irregularities in the complaint process that affected the outcome.
- The proposed resolution was not reasonable based on the evidence compiled during the investigation.

The decision of the Associate Dean of Student Affairs on the medical sciences or the Associate Dean of Student Affairs or authorized designee on the appeal is final.

Confidentiality Policy for Student Complaints

RUSM wishes to create an environment in which individuals feel free to discuss and redress concerns and complaints. RUSM understands that complainants, witnesses, and others involved in the investigation process may be concerned about the confidentiality of information they are sharing. In some cases, however, RUSM may be obligated to take action when it becomes aware of information relating to a complaint. Confidentiality will be maintained to the extent possible and consistent with RUSM's obligations in investigating complaints.

Once an individual discloses identifying information to RUSM through the processes described above, they will be considered to have filed a complaint with RUSM. While the confidentiality of information received, the privacy of individuals involved, and compliance with the wishes of the complainant or witnesses cannot be guaranteed, they will be respected to the extent possible and appropriate.

In the event that a student wishes to discuss a matter with greater assurances of confidentiality, they are encouraged to contact the RUSM Wellness and Counseling Center.

Retaliation Policy Regarding Student Complaints

RUSM prohibits retaliation, in all its forms and manifestations, against anyone who reports an incident of alleged harassment, discrimination or other unlawful conduct, or any person who assists or participates in a proceeding, investigation or hearing relating to such allegations.

Retaliation includes, but is not limited to, any form of intimidation, reprisal, or harassment. All complaints of retaliation should be reported in accordance with the complaint procedures outlined above. If the procedures outlined above would result in the student being required to submit their complaint to the person whom they believe is retaliating against him or her, the student may submit the retaliation complaint to the campus or location leader, who will determine an appropriate party to address the retaliation complaint.

Submission of a good-faith complaint or report of harassment, discrimination or other unlawful conduct will not adversely affect the complainant's future grades, learning, or academic environment. RUSM will discipline or take appropriate action against anyone who retaliates against any person who reports an incident of alleged harassment, discrimination, or other unlawful conduct, or who retaliates against any person who testifies, assists or participates in a proceeding, investigation or hearing related to such allegations.

TITLE IX POLICY

Ross University School of Medicine (“RUSM”) is committed to providing a work and educational environment free of unlawful harassment, discrimination and retaliation. In accordance with Title IX of the Education Amendments of 1972, RUSM does not discriminate on the basis of sex in its education Program or Activity, which extends to admission and employment. RUSM also prohibits Sexual Harassment (as defined below) committed against persons in the United States as part of its educational Program or Activity.

If you believe that you have experienced or witnessed sexual misconduct or discrimination as part of RUSM's educational Program or Activity outside the United States, please follow the procedures outlined in the RUSM Sex and Gender-Based Sexual Misconduct Response and Prevention Policy.

RUSM reserves the right to make changes to this policy as necessary, and once those changes are posted online, they are in effect. If government laws, regulations or court decisions change requirements in a way that affects this policy, the policy will be construed to comply with the most recent government regulations or holdings.

TITLE IX COORDINATOR

The Title IX Coordinator coordinates RUSM’s efforts to comply with its Title IX responsibilities.

Title IX Coordinator: **Kelsey Bowen**
 Coordinator, Student Affairs
 Ross University School of Medicine
 2300 SW 145th Avenue | Suite 200 | Miramar, FL 33027
 754.208.4774 | TitleIXCoordinator@RossU.edu

The Title IX Coordinator is responsible for implementing RUSM’s Title IX policy, intaking reports and Formal Complaints of Sexual Harassment and providing supportive measures. The Title IX Coordinator is also responsible for maintaining corresponding Clery Act crime statistics and reporting to the Director, Enterprise Safety and Security.

Any person can report sex discrimination, including Sexual Harassment (whether or not the person reporting is the alleged victim) in person, by mail, telephone, or e-mail, using the contact information listed above for the Title IX Coordinator. A report can be made at any time, including during non-business hours. However, responses to reports made outside of business hours, including during weekends and holidays, may be delayed.

Reports can be made by victims, third parties or bystanders with the option to remain anonymous through the Speak Up program by phone at **1.800.461.9330 (in the U.S.) or 1.855.203.6928 (in Barbados)**, or online at **www.speakupadtalem.com**.

KEY DEFINITIONS

“**Affirmative consent**” is the affirmative, knowing, conscious, voluntary and mutual agreement to engage in sexual activity. Consent can only exist free from intimidation, force, threat of force or coercion. Under this Policy, “No” always means “No” and “Yes” may not always mean “Yes.” Anything but voluntary, conscious, affirmative consent to any sexual activity is equivalent to “no” for purposes of this Policy. It is the responsibility of each person involved in the sexual activity to ensure that he or she has the affirmative consent of the other or others to engage in the sexual activity. Affirmative consent must be ongoing throughout a sexual

activity and can be revoked at any time. While the legal definition of consent is found in RUSM's Annual Safety Report, the following general rules apply when assessing whether consent has been/was given.

- Consent can never be assumed.
- The lack of protest or resistance does not constitute consent, nor does silence.
- Where there is use of threat, force or restraint by the Respondent, the lack of verbal or physical resistance or the submission by the Complainant does not constitute consent.
- The manner of dress of the Complainant does not constitute consent.
- The existence of a dating relationship between the persons involved or the fact of past sexual relations between them should never, by itself, be assumed to be an indicator of consent.
- Consent to sexual activity with one person does not constitute consent to sexual activity with another person.
- A person who initially consents to sexual contact, including penetration, may withdraw continued consent at any time during the course of that interaction. When consent is withdrawn or can no longer be given, engagement in sexual activity must stop.
- Consent to some form of sexual activity cannot automatically be taken as consent to any other form of sexual activity.
- A person cannot consent to sexual activity if that person is unable to understand the nature of the activity or give knowing consent due to circumstances, including without limitation the following: the person is incapacitated due to use or influence of alcohol or drugs; the person is asleep or unconscious; the person is under age, or the person is incapacitated due to a mental disability.
- Consent is required regardless of whether the person initiating sexual activity is under the influence of drugs and/or alcohol.
- A power differential between people engaged in a sexual act presumes the inability to consent for the less powerful person (e.g., the student in a student-colleague interaction; the supervisee in a direct report-supervisor interaction).
- It is not a valid excuse to alleged lack of affirmative consent that the Respondent believed the Complainant consented to sexual activity if the:
 - Respondent's belief arose from the Respondent's own intoxication or recklessness
 - Respondent did not take reasonable steps to ascertain whether the Complainant affirmatively consented
 - Respondent knew or a reasonable person should have known that the Complainant was unable to consent because the Complainant was asleep, unconscious, incapacitated due to the influence of drugs, alcohol or medication, or was unable to communicate due to a mental or physical condition.

“Colleague” an employee of Ross University School of Medicine.

“Colleague Code of Conduct” refers to the “Adtalem Code of Conduct and Ethics” (https://www.adtalem.com/sites/g/files/krcnkq321/files/migrations/media/Code%20of%20Conduct_English%20and%20Portuguese.pdf), which is applicable to colleagues at all Adtalem Global Education institutions and offices and outlines colleagues' rights and responsibilities.

“Colleague complaint procedure” is the vehicle by which colleagues can bring to the administration's attention any complaint relating to their experience with RUSM or a member of the RUSM community. It is the mechanism for investigating and trying to resolve complaints raised by colleagues and can be found in the Commons (apps.adtalem.com > **Commons- HR Portal > Policy Central**).

“**CRC**” refers to the Coaching Resource Center, which is available to managers to assist in addressing colleague relations concerns, including complaints about colleague or vendor conduct.

“**Member of the RUSM community**” includes students, faculty members or staff and any other individuals associated with RUSM. The conduct administrator or complaint administrator shall determine a person’s status in a particular situation.

“**Notice**” refers to any information regardless of whether it is direct, indirect, partial or complete received by a colleague that indicates possible sex or gender-based misconduct. When notice is received, colleagues are required to inform the Title IX Coordinator or their supervisor who, in turn, must make a report to the Title IX Coordinator.

“**One-up manager**” is a colleague’s manager’s manager. It is the person responsible for receiving a colleague’s complaint when his/her direct manager is implicated in that complaint.

Sexual Harassment: Conduct on the basis of sex that satisfies one or more of the following:

1. An employee of RUSM conditioning educational benefits or participation on an individual’s participation in unwelcome sexual conduct (i.e. quid pro quo);
2. Unwelcome conduct that a reasonable person would determine is so severe, pervasive, and objectively offensive that it effectively denies a person equal access to RUSM’s education Program or Activity; or
3. Sexual Assault (as defined in the Clery Act), or Dating Violence, Domestic Violence or Stalking as defined in the Violence Against Women Act (VAWA)*:
 - **Sexual Assault**²: As defined in 20 U.S.C. 1092(f)(6)(A)(v), means an offense classified as a forcible or nonforcible sex offense under the uniform crime reporting system of the Federal Bureau of Investigation.
 - **Dating Violence**: As defined in 34 U.S.C. 12291(a)(10), means violence committed by a person (A) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (B) where the existence of such a relationship shall be determined based on a consideration of the following factors: the length of the relationship; the type of relationship; and, the frequency of interaction between the persons involved in the relationship.
 - **Domestic Violence**: As defined in 34 U.S.C. 12291(a)(8), includes felony or misdemeanor crimes of violence committed by a current or former spouse or intimate partner of the victim, by a person with whom the victim shares a child in common, by a person who is cohabitating with or has cohabitated with the victim as a spouse or intimate partner, by a person similarly situated to a spouse of the victim under the domestic or family violence laws of the jurisdiction receiving grant monies, or by any other person against an adult or youth victim who is protected from that person’s acts under the domestic or family violence laws of the jurisdiction.

² The FBI’s Uniform Crime Reporting Program (FBI UCR) includes forcible and nonforcible sex offenses such as rape, fondling, and statutory rape, which contain elements of “without the consent of the victim.”

- **Stalking:** As defined in 34 U.S.C. 12291(a)(30), means engaging in a course of conduct directed at a specific person that would cause a reasonable person to: (A) fear for his or her safety or the safety of others; or (B) suffer substantial emotional distress.

* Please note: In accordance with the Violence Against Women Reauthorization Act of 2013 (“VAWA”), state definitions for Sexual Assault, Dating Violence, Domestic Violence, Stalking and Consent are contained in RUSM’s Annual Safety and Security Report (“ASR”). VAWA crimes are reported in the ASR based on the definitions above.

Complainant: An individual who is alleged to be the victim of conduct that could constitute Sexual Harassment, regardless of whether a Formal Complaint has been filed. A Complainant must be the alleged victim unless a parent or legal guardian has a legal right to act on the alleged victim’s behalf.

Respondent: An individual who has been reported to be the perpetrator of conduct that could constitute Sexual Harassment.

Formal Complaint: A document (hardcopy or electronic) filed by a Complainant or signed by the Title IX Coordinator alleging Sexual Harassment against a Respondent and requesting that RUSM investigate. A Formal Complaint must be signed (physical or digital) by the Complainant, the Title IX Coordinator, or otherwise indicate that the Complainant is the person filing the Formal Complaint. At the time of filing a Formal Complaint, the Complainant must be participating in or attempting to participate in RUSM’s education Program or Activity with which the Formal Complaint is filed.

Program or Activity: On or off campus locations, events, or circumstances over which RUSM exercises substantial control over both the Respondent and the context in which the Sexual Harassment occurred.

Mandatory Reporter: Designated College employees who must report all instances of Sexual Harassment to the Title IX Coordinator.

Discretionary Reporter: Designated College employees who may, with the Complainant’s consent, report instances of Sexual Harassment to the Title IX Coordinator.

Clery Geography: As defined in the Clery Act, includes (A) buildings and property that are part of RUSM’s campus; (B) RUSM’s noncampus buildings and property; and (C) public property within or immediately adjacent to and accessible from the campus. A map of RUSM’s Clery Geography is contained in RUSM’s ASR.

PROCEDURE FOR REPORTING SEXUAL HARASSMENT

If you believe that you have experienced or witnessed Sexual Harassment, RUSM encourages you to notify the Title IX Coordinator as soon as possible after the incident. A report may be made to either or both the police and the Title IX Coordinator. The criminal process is separate from RUSM’s Title IX grievance process. Complainants have the option to notify law enforcement directly or be assisted in doing so. If requested, RUSM will assist a victim of Sexual Violence in contacting the police. A Complainant is not required to contact the police to pursue RUSM’s grievance process.

CONFIDENTIALITY

To make informed choices, it is important to be aware of confidentiality and reporting requirements when consulting College resources. Colleagues who are made aware of a possible violation of this policy are required to contact their manager or one-up manager and also the Title IX Coordinator. All College Colleagues are designated mandatory reporters will notify the Title IX Coordinator of any complaints received.

Confidential Resources: **Dr. Dahlia Gibson**
 Director of Counseling
 Ross University School of Medicine
 Two Mile Hill, St. Michael, Barbados BB11093

The Adtalem Speak Up Program (“SpeakUp”) is a reporting system managed by a third-party vendor (Convercent), which encourages members of the RUSM community to come forward with questions or concerns, including allegations of sex and/or gender-based misconduct. Reports can be made anonymously, or reporters can provide their name and contact information. Colleagues are expected to ask legal, compliance and ethics questions and report suspected wrongdoing. Colleagues and students can utilize the Speak Up program by contacting the third-party contractor Convercent by phone at **1.800.461.9330 (in the U.S.) or 1.855.203.6928 (in Barbados)**, or online at www.speakupadtalem.com.

RUSM will keep confidential the identity of the Complainant, Respondent, and witnesses, except as may be permitted by FERPA, as required by law, or as necessary to carry out the Title IX grievance process.

There is no time limitation on providing notice/complaints to the Title IX Coordinator. However, if the Respondent is no longer subject to RUSM’s jurisdiction and/or significant time has passed, the ability to investigate, respond, and provide remedies may be more limited or impossible. Acting on notice/complaints significantly impacted by the passage of time (including, but not limited to, the rescission or revision of policy) is at the discretion of the Title IX Coordinator, who may document allegations for future reference, offer Supportive Measures and/or Remedies, and/or engage in informal or formal action, as appropriate.

Prevention and Awareness

Acts that are deemed to fall within the scope of this Policy are violations of the Codes of Conduct as well as the expectations of members of the RUSM community. These acts may also be crimes. To increase the likelihood of intervention and reduce the risk of sex and/or gender-based misconduct from occurring among its students and colleagues, RUAM is committed to providing primary and ongoing awareness and prevention programming.

Primary and ongoing awareness and prevention programs will cover the continuum of issues contemplated by this Policy. Themes will include situational awareness and prevention strategies, such as bystander intervention and other forms of risk reduction. While bystander intervention specifically refers to the safe and effective ways in which third parties can intervene to thwart sex and/or gender-based misconduct, risk reduction also encompasses various strategies to eliminate or reduce risk of harm by avoiding or removing oneself from situations that are dangerous or uncomfortable. Awareness programs are events that occur online or in person that invite active engagement of community members. It is the expectation and responsibility of each member of the RUSM community to participate in programming which will assist with ongoing prevention efforts as well as effective and efficient identification and response when sex and/or gender-based misconduct does occur.

Primary prevention and awareness programming will include a comprehensive online education platform intended for viewing by all colleagues and students as well as student-facing vendors if necessary and appropriate. The program will be completed by:

- New students and transfer students within three weeks of the start of the student’s first session
- Returning and continuing students who did not take the training as a new or transfer student within three weeks of the start of the session the student is scheduled to resume or continue studies
- Colleagues by the date stated in email notification

- Specific vendors by the date stated in email notification

Access to the primary prevention program and its contents will be ongoing throughout the participant's relationship with RUSM. Members of the RUSM community are encouraged to visit this resource regularly for personal, professional and academic purposes.

Ongoing prevention and awareness campaigns are public service announcements and campaigns as well as messages and activities integrated into the day-to-day fabric of the academic community. These initiatives are intended to reinforce increased awareness regarding sex and/or gender-based misconduct and prevention strategies throughout the year. RUSM will continually seek formal and informal ways to incorporate additional awareness and prevention strategies, e.g., active and passive educational campaigns, such as social norms poster campaigns, newsletter articles, presentations and volunteerism with local community resource agencies. When additional ongoing education is provided, the organizer will report that event, activity or effort to the Title IX Coordinator for record keeping and quality assurance purposes. Toolkits including ideas and resources that support ongoing efforts and are related to the primary prevention and awareness programming, will be made available to any campus upon request.

Additional training will be delivered to colleagues responsible for responding to reports of sex and/or gender-based misconduct, including but not limited to complaint administrators, conduct administrators, conduct panelists and appeal reviewers. These colleagues should complete the primary prevention and awareness programming described above as well as remote or live training and/or consultation with the Title IX Coordinator before and during management of an allegation within the scope of this Policy.

Complainant Rights

Complainant rights include:

4. The right to notify or not notify law enforcement and to request and receive assistance from RUSM in making a report if desired.
5. The right to summary information on all available response options, such as complaint resolution procedures, including the necessary steps and potential consequences of each option whether or not a formal report is made to the institution.
6. The right to be free from undue coercion from RUSM to pursue or not pursue any course of action.
7. The right to be informed of the institution's role regarding orders of protection, no contact orders, restraining orders or similar lawful orders issued by a civil, criminal or tribal court (when applicable). RUSM abides by orders of protection (including no-contact orders and restraining orders), which are generally issued by a municipal court to protect a person or entity in a situation involving sexual assault. RUSM may also liaise with local authorities to assist an individual who wishes to obtain protective or restraining orders.
8. The right to request and receive information on how to make a confidential report for the purposes of tracking campus crime without otherwise divulging details that would require or permit RUSM to investigate and respond (when the incident has not yet been reported to a colleague required to notify the Title IX Coordinator and/or Sexual Misconduct Response Coordinator).

9. The right to contact information for the Title IX Coordinator and/or Sexual Misconduct Response Coordinator, available confidential advisors, community-based resources (sexual assault crisis centers or other appropriate support services), campus security and/or local law enforcement.
10. The right to be fully informed of any applicable disciplinary conduct process and procedures.
11. The same rights as the Respondent to attend and have a support person of their choice and/or witnesses present at student conduct hearings and any meetings leading up to such a hearing.
12. The right to be informed of the outcome of any student or colleague conduct process involving alleged sex or gender-based misconduct regardless of participation in the process leading to that outcome. In the case of student conduct proceedings, both parties have the right to appeal the outcome.
13. The right to request Supportive Measures.
14. The right to obtain and have enforced a campus-issued limiting instruction or no contact order or a court issued order of protection or no contact order.
15. The right to be informed about RUSM's ability to provide assistance, upon request, in accessing and navigating campus and/or community resources for health, mental health, advocacy, and/or other services for survivors of sexual assault, relationship violence and other forms of sexual misconduct.
16. The right to be free from any suggestion that they are at fault or should have acted in a different manner to avoid reported sex or gender-based misconduct.
17. The right to not be required to describe the incident to more representatives than absolutely necessary for proper investigation and response and under no circumstances will a complainant be required to repeat details of the incident to secure appropriate accommodations.
18. The right to make an impact statement during the point in any conduct review process where the decision maker is prepared to deliberate on appropriate sanctions.

For more specific instructions on how to properly comply with this Policy, consult the Title IX Coordinator.

Amnesty for Complainants and Witnesses

RUSM will investigate allegations of sex and gender-based misconduct, including when drugs or alcohol may have been involved. RUSM encourages the reporting of sex and gender-based misconduct by complainants and witnesses who are sometimes hesitant to report to RUSM officials or participate in the resolution processes because of concern that they may be accused of policy violations, such as underage drinking or drug use at the time of the incident. It is in the best interest of the community that complaints and witnesses come forward to share what they know regarding violations of this Policy. To encourage reporting, RUSM grants complainants and witnesses amnesty, when appropriate, for potential RUSM policy violations and provides all parties and witnesses other interim measures as appropriate or needed.

Similarly, encourages direct assistance to those in need as a result of sex or gender-based misconduct. In instances where minor policy violations are revealed as a result of a person providing assistance to a complainant, policy violations should not be overlooked; however, RUSM may provide educational options, rather than punitive sanctions, to those who offer their assistance.

SUPPORTIVE MEASURES

The Title IX Coordinator will provide Supportive Measures as necessary. Supportive Measures are individualized services reasonably available to ensure equal educational access, protect safety or deter Sexual Harassment. Supportive Measures are available, as appropriate, to either or both the Complainant and Respondent and are non-punitive, non-disciplinary and not unreasonably burdensome to the other party. Examples include counseling, extensions of time or other course-related adjustments, modifications to work or class schedules, campus escort services, restrictions on contact between the parties, leave of absence, increased security and monitoring of certain areas on campus, and other similar accommodation.

Supportive Measures are individualized and appropriate based on the information gathered by the Title IX Coordinator. The Supportive Measures needed by the Complainant and/or Respondent may change over time, and the Title IX Coordinator will communicate with each party to ensure that any Supportive Measures are necessary and effective based on evolving needs.

Once the Title IX Coordinator receives a report of Sexual Harassment, the Title IX Coordinator will promptly contact the Complainant confidentially to discuss the availability of Supportive Measures (available with or without filing a Formal Complaint) and explain the process for filing a Formal Complaint and provide a copy of this policy. The Title IX Coordinator will consider the Complainant's wishes with respect to Supportive Measures.

RUSM will maintain the privacy of the Supportive Measures, provided that privacy does not impair RUSM's ability to provide the Supportive Measures.

EMERGENCY REMOVAL

RUSM can remove a Respondent entirely or partially from an education Program or Activities on an emergency basis when an individualized safety and risk analysis has determined that an immediate threat to the physical or safety of any student or other individual justifies removal. The risk analysis is performed by the Title IX Coordinator in conjunction with the Director, Enterprise Safety and Security.

In cases in which an emergency removal is imposed, the Respondent will be given notice of the action and the option to request to meet with the Title IX Coordinator prior to such action/removal being imposed, or as soon thereafter as reasonably possible, to show cause why the action/removal should not be implemented or should be modified. This meeting is not a hearing on the merits of the allegation(s), but rather is an administrative process intended to determine solely whether the emergency removal is appropriate. When this meeting is not requested in a timely manner, objections to the emergency removal will be deemed waived.

The Title IX Coordinator has sole discretion under this policy to implement or stay an emergency removal and to determine the conditions and duration. Violation of an emergency removal under this policy will be grounds for discipline, which may include expulsion or termination.

RUSM will implement the least restrictive emergency actions possible in light of the circumstances and safety concerns. As determined by the Title IX Coordinator, these actions could include, but are not limited to: temporarily re-assigning a Colleague, restricting a student's or Colleague's access to the campus, allowing a student to withdraw or take grades of incomplete without financial penalty, and authorizing an administrative leave.

COMPLAINT DISMISSAL

Dismissal of a Formal Complaint may occur under several circumstances. RUSM must dismiss a Formal Complaint if the allegations do not meet the definition of Sexual Harassment, did not occur in RUSM's education Program or Activity, or did not occur against a person in the United States.

RUSM may dismiss a Formal Complaint if the Complainant informs the Title IX Coordinator, in writing, that he, she, or they withdraw the Formal Complaint or allegations therein; the Respondent is no longer enrolled or employed by RUSM; or if specific circumstances prevent RUSM from gathering sufficient evidence to reach a determination.

If a Formal Complaint is dismissed, the parties will be provided written notice of the dismissal outlining the reason(s) for dismissal. A dismissal does not preclude action by RUSM under its Sex and Gender-Based Sexual Misconduct Response and Prevention Policy.

TITLE IX GRIEVANCE PROCESS

RUSM utilizes a prompt, equitable and impartial grievance process to evaluate Formal Complaints. Title IX personnel (Title IX Coordinators, Investigators, Decision-Makers, individuals who facilitate informal resolution process) will be free from conflicts of interest or bias for or against Complainants or Respondents. Title IX personnel will objectively evaluate all relevant evidence and avoid credibility determinations based on a person's status as a Complainant, Respondent or witness.

Both parties will receive equal opportunity to provide information, witness statements, evidence, and other information that may be necessary to fully evaluate the alleged offense. Both parties will be afforded equitable rights and access during the grievance process. The Respondent is presumed not responsible for the alleged conduct until a determination regarding responsibility is made at the conclusion of the grievance process.

Generally, the grievance process consists of a Formal Complaint, investigation, live hearing, determination, disciplinary measures, remedies and appeal (if applicable). The grievance process, barring extenuating circumstance, will conclude within 90 calendar days from the date a Formal Complaint is filed.

Advisor

The parties may be accompanied by an advisor of their choice and at their own expense. If the Complainant or Respondent does not have an advisor present at the live hearing, RUSM will select and provide an advisor, without fee or charge, to conduct cross-examination of witnesses on behalf of that party. The Complainant and Respondent may not conduct cross-examination.

Choosing an advisor who is a witness in the Grievance Process creates potential for bias and conflict of interest. A party who chooses an advisor who is also a witness can anticipate that issues of potential bias will be explored by the Decision-Maker.

The Complainant and Respondent are expected to ask and respond to questions on their own behalf throughout the investigation phase of the grievance process. Advisors are expected to advise without disrupting proceedings. For example, advisors should not address College officials in a meeting or interview unless invited to. An advisor may not make a presentation during any meeting or proceeding and may not speak on behalf of the party to the investigation or other Decision-Maker except during a live hearing, during cross-examination. If an advisor is disruptive or otherwise fails to respect the limits of the advisor role, the meeting or interview may be ended by the Decision Maker.

Advisors are expected to maintain the privacy of the records shared with them. These records may not be shared with third Parties, disclosed publicly, or used for purposes not explicitly authorized by RUSM. Ross University School of Medicine may seek to restrict the role of any advisor who does not respect the sensitive nature of the process or who fails to abide by RUSM's privacy expectations.

Investigation of Complaints

RUSM will investigate Sexual Harassment allegations in a Formal Complaint filed by a Complainant or signed by the Title IX Coordinator. The Title IX Coordinator will respect the Complainant's wishes as to whether RUSM investigates an allegation of Sexual Harassment, unless the Title IX Coordinator determines that not investigating would be deliberately indifferent or harmful to the RUSM community. A Complainant is not required to participate in an investigation and grievance process for Formal Complaints signed by the Title IX Coordinator. However, the ability to investigate, respond, and provide Remedies may be limited or impossible without participation of the Parties. RUSM may consolidate Formal Complaints where the allegations arise out of the same facts.

Upon receipt of a Formal Complaint, written notice will be sent to the parties. The Notice of Investigation will include: details of the allegations (including identities of the parties involved, specific section of the policy alleged to have been violated, the conduct that would be considered Sexual Harassment, the date of the incident(s) and the location of the incident(s)); a statement that the Respondent is presumed to be not responsible for the alleged conduct until a determination is made according to RUSM's grievance process; a statement that the parties may have an advisor of their choice; and a reminder of the expectation of truthfulness including consequences for submitting false information. The parties will also be provided with separate written notice of any investigative interview, meeting or hearing. Interview/meeting notices will include the date, time, location, participants and purpose of the investigative interview or meeting.

Formal Complaints involving Colleagues may also be referred to Human Resources and simultaneously evaluated under Colleague conduct policies and procedures.

During the investigation, the Office of Equity and Access will select an Investigator to conduct interviews and gather evidence. The parties will be provided an equal opportunity to present fact and expert witnesses or other evidence. The parties (and their advisors) will be provided with evidence directly related to the allegations, in electronic format or hardcopy, with at least 10 days for the parties to inspect, review, and respond to the evidence. The Investigator will consider the responses received from the parties before issuing the investigative report.

Once the investigation has concluded, the Investigator will draft an investigative report (hardcopy or electronic) that fairly summarizes relevant evidence. The investigative report will be sent to the parties (and their advisors) at least 10 days prior to a live hearing. The parties may provide a written response to the investigative report.

Informal Resolution

If the Title IX Coordinator deems appropriate and both parties voluntarily consent in writing, Formal Complaints can be resolved through informal resolution, such as mediation. The Title IX Coordinator will facilitate an appropriate informal resolution process depending on the nature of the allegations, the parties involved, and the overall circumstances. Informal resolution will be conducted by a facilitator, who will be designated by the Title IX Coordinator. At any time prior to agreeing to a resolution, any party has the right to withdraw from the informal resolution process and resume the grievance process. Informal resolution is unavailable to resolve allegations that a Colleague sexually harassed a student.

Live Hearing

If a report is not resolved informally, RUSM will conduct a live hearing. Live hearings are facilitated by a designated Decision-Maker. The Decision Maker will be selected by the Office of Equity and Access. The Decision-Maker consists of a panel of no fewer than three (3) members, designated from the hearing panel.

Cross-examination during the live hearing will be conducted directly, orally, and in real time by the party's advisor and not by a party personally. The Decision-Maker will permit each party's advisor to ask the other party and any witnesses all relevant questions and follow-up questions, including that challenge credibility. Only relevant cross-examination questions (as well as other questions deemed pertinent at the discretion of the Decision-Maker) may be asked of a party or witness. Before a Complainant, Respondent, or witness answers a cross-examination question, the Decision-Maker must first determine whether the question is relevant and explain to the party's advisor asking cross-examination questions any decision to exclude a question as not relevant.

Rape shield protections are applied to Complainants, deeming irrelevant questions and evidence about a Complainant's prior sexual behavior unless offered to prove that someone other than the Respondent committed the alleged Sexual Harassment or offered to prove consent.

As of August 24, 2021, and pursuant to the Department of Education's August 24, 2021 guidance, the Decision-Maker may consider statements from a party or witness who are not present at the live hearing in reaching a determination regarding responsibility, so long as the questions are otherwise permissible. However, the Decision-Maker will not draw an inference about the determination regarding responsibility based solely on a party's or witness's absence from the live hearing or refusal to answer questions.

At the request of either party, RUSM will provide for the entire live hearing (including cross-examination) to occur with the parties located in separate rooms with technology enabling the parties to see and hear each other. Live hearings may be conducted with all parties physically present in the same geographic location or, at RUSM's discretion, any or all parties, witnesses, and other participants may appear at the live hearing virtually. An audio or audiovisual recording, or transcript, of any live hearing will be created and maintained for seven (7) years.

Individuals participating in the live hearing cannot be disruptive and must follow the policies and procedures set by RUSM. The Decision-Maker has the authority to enforce decorum.

Evidence Limitations

RUSM will not use, rely on or seek disclosure of information protected under a legally recognized privilege, unless the person holding such privilege has waived the privilege. RUSM will not access or use a party's medical, psychological, and similar treatment records unless the party provides voluntary, written consent.

Standard of Evidence

For all Formal Complaints of Sexual Harassment (including where Colleagues are Respondents), RUSM utilizes the preponderance of the evidence standard; whether it is more likely than not that the Respondent violated the policy as alleged.

Disciplinary Actions

Disciplinary actions against the Respondent will not be imposed before completion of RUSM's grievance process. Following a determination of responsibility, appropriate corrective action will be taken, and RUSM will take steps to prevent recurrence. Disciplinary actions taken will be determined on a case-by-case basis. Any Colleague determined by RUSM to be responsible for an act of Sexual Harassment will be subject to appropriate disciplinary action, up to and including termination. Colleagues are also subject to processes and discipline determined by the Human Resources Department. The HR process is separate and apart from the Title IX process and not constrained by the outcome of the Title IX process. Remedies for student-related claims may include, but are not limited to, additional training, a restriction on contact, suspension, or termination.

Failure to abide by imposed disciplinary actions (whether by refusal, neglect or any other reason), may result in additional disciplinary action, including suspension or termination.

Individuals who make a materially false statement in bad faith in the course of a Title IX grievance process will be subject to RUSM's Code of Conduct policies.

Remedies

Remedies are provided to a Complainant whenever a Respondent is found responsible and may be disciplinary and punitive. Student remedies are designed to maintain the Complainant's equal access to education. Remedies will be determined on a case-by-case basis and reasonable under the circumstances. Remedies may include supportive measures.

Written Determination

The Decision-Maker will issue a written determination regarding responsibility with findings of fact, conclusions about whether the alleged conduct occurred, rationale for the result as to each allegation, a description of the procedure from Formal Complaint through the live hearing, disciplinary sanctions imposed on the Respondent and whether remedies will be provided to the Complainant. The determination will be sent simultaneously to the parties along with information on how to file an appeal.

Appeal

Both parties have the right to appeal a determination regarding responsibility, RUSM's dismissal of a Formal Complaint or any allegations therein if: (1) procedural irregularity affected the outcome of the matter; (2) there is newly discovered evidence that could affect the outcome of the matter; (3) Title IX personnel had a conflict of interest or bias, that affected the outcome of the matter; and/or (4) the proposed Remedy was not reasonable based on the evidence compiled during the investigation

An appeal must be submitted in writing to the Title IX Coordinator within ten days of the delivery of the Written Determination. The person ruling on the appeal shall notify in writing the complainant and respondent of the outcome of the appeal. If the appeal is granted, the matter can be remanded to the either the decision-maker or a new panel, as determined to be appropriate by the person considering the appeal) or the conduct administrator for action to be taken in response to the appeal findings. If the appeal is denied, then the decision of the original conduct proceeding is upheld and final.

RETALIATION PROHIBITED

Retaliation (including intimidation, threats, coercion or discrimination) against an individual for raising an allegation of Sexual Harassment, for cooperating in the grievance process is prohibited.

If you believe you have been retaliated against, you should follow the procedures outlined in RUSM's Retaliation Policy located in the Student Handbook and Employee Handbook.

TRAINING

RUSM ensures that its Title IX personnel have adequate training. The Title IX Coordinator and Investigators are trained on the definition of Sexual Harassment, the scope of RUSM's education Program or Activity, how to conduct an investigation, RUSM's grievance process (including hearings, appeals, and informal resolution processes, as applicable) and how to serve impartially by avoiding prejudgment of the facts at issue, conflicts of interest, and bias. Decision-Makers are trained on the definition of Sexual Harassment, the live hearing process, technology to be used in live hearings, and issues of relevance (including how to apply the rape shield protections provided for Complainants). Informal resolution facilitators are trained on the informal resolution process.

Materials used to train Title IX personnel are posted on RUSM's website and may also be requested directly from the Title IX Coordinator.

In accordance with the Jeanne Clery Disclosure of Campus Security Policy and Crime Statistics Act ("Clery Act") and the Violence Against Women Reauthorization Act of 2013 ("VAWA"), RUSM will provide primary prevention and awareness programs to prevent Sexual Assault, Dating Violence, Domestic Violence and Stalking to incoming students and new Colleagues during the fall term.

BIAS/CONFLICT OF INTEREST

To raise any concern involving bias or conflict of interest by the Title IX Coordinator, contact the Director of the Office of Equity and Access, Dwight Hamilton, by phone at 312.651.1458 or by email at equity@adtalem.com. Concerns of bias or potential conflict of interest by any other Title IX personnel should be raised with the Title IX Coordinator.

REPORTING REQUIREMENTS

College administrators will issue timely warnings for incidents reported that pose a substantial threat of bodily harm or danger to other members of the campus community. RUSM will make every effort to ensure that a victim's name and other identifying information is not disclosed, while still providing enough information for community members to make safety decisions in light of the danger. RUSM reserves the right to notify parents/guardians of dependent students regarding any health or safety risk, or a change in student status.

Personally identifiable information for victims of Sexual Assault, Dating Violence, Domestic Violence and Stalking will not be included in any publicly available recordkeeping, including Clery Act Reporting and disclosures such as the ASR.

ADDITIONAL INFORMATION

Students and Colleagues may contact the Title IX Coordinator with any questions related to this policy. In addition, the U.S. Department of Education Office for Civil Rights ("OCR") investigates complaints of unlawful harassment of students in educational programs or activities. This agency may serve as a neutral fact finder and will attempt to facilitate the voluntary resolution of disputes with the parties. For more information,

visit the OCR website at <http://www.ed.gov/ocr/>. To the extent that a Colleague or contract worker is not satisfied with RUSM's handling of a complaint, he or she may also contact the appropriate state or federal enforcement agency for legal relief.

The OCR National Headquarters is located at:

U.S. Department of Education
Office for Civil Rights
Lyndon Baines Johnson Department of Education Bldg
400 Maryland Avenue, SW
Washington, DC 20202-1100

Telephone: 800-421-3481
FAX: 202-453-6012; TDD: 800-877-8339
Email: OCR@ed.gov

Primary Prevention and Awareness Programs

Risk Reduction Tips

Responsibility for sexual misconduct rests with those who commit such acts. Risk reduction tips are not intended to blame the victim. There are precautions we all can take which may limit our exposure to situations which may result in non-consensual sexual acts.

- Communicate limits/ boundaries and respect the limits/boundaries of others.
- Clearly and firmly say "No" to a sexual aggressor.
- If possible, leave the physical presence of a sexual aggressor or otherwise violently aggressive person.
- If someone is nearby, ask for help.
- Take responsibility for your alcohol/drug use. Acknowledge that alcohol/drugs lower sexual inhibitions and may make you vulnerable to someone who sees an impaired person as a sexual opportunity.
- Do not take advantage of someone's intoxication or altered state even if alcohol or drugs were consumed willingly.
- If you choose to share intimate images, pictures, videos or content with others, even those you trust, be clear about your expectations regarding how the information may be used, shared or disseminated. If such information is shared with you, do not share it with others.
- Take care of friends and ask that they take care of you.
- As a sexual initiator, clearly communicate your intentions and give your sexual partner the opportunity to clearly communicate the same.
- Do not make assumptions about consent, sexual availability, sexual attraction, how far an interaction can go or about physical and/or mental ability to consent.
- Remember that consent should be affirmative and continuous. If there is any question or ambiguity, you should proceed as if you do not have consent.
- Consider mixed messages from a partner to be an indication that sexual conduct should stop so that better communication can occur.
- Recognize the potential for a sexual partner to feel intimidated or coerced by you as a result of a power advantage, your gender, your demeanor or your physical presence. Do not use or abuse that power.

Bystander Intervention Strategies

Intervention by classmates, colleagues and others within proximity to the precursors or signs of possible sexual assault, sexual exploitation, dating violence, domestic violence or stalking can significantly impact the course of an interaction between a latent perpetrator and victim. Bystanders may also encourage friends, classmates and colleagues who are already experiencing victimization to seek assistance sooner than they may have without encouragement, support or acknowledgment. Community members are encouraged to recognize warning signs and to consider possible methods of interference in various scenarios before opportunities to intervene arise. By planning ahead, we all maximize the likelihood of being empowered to take safe actions to either prevent sexual misconduct or offer paths to eliminate ongoing victimization.

When a member of the RUSM community observes threatening, coercive, forceful, aggressive, or harassing behavior, it is important to assess the situation to determine the best possible course of action for all concerned. Some forms of intervention are direct, while others will be less apparent to the perpetrator or others within range of the interaction. Examples include but are not limited to:

- Making up an excuse to get someone out of a dangerous situation.
- Stepping in to change the course of an interaction.
- Warning potential or perceived perpetrators that their actions may lead to severe consequences.
- Refusing to leave the company of a potential victim despite efforts by an aggressor or pursuer to get the potential victim alone.
- Taking steps to reduce alcohol or drug consumption within a potentially dangerous social situation.
- Calling and cooperating with security, administration, the police or others to assist with intervention and accountability.
- Expressing concern or offering resources when you notice someone with unexplained or frequent injuries.
- Refusing to consider sex and/or gender-based misconduct a personal or private matter between the victim and the perpetrator.

Procedures to Follow After a Sexual Misconduct Incident

Complainants of any sexual misconduct that might constitute a crime, including domestic violence, dating violence, sexual assault, stalking and rape (including acquaintance rape) that impacts the RUSM community have the option and are encouraged to contact local law enforcement authorities. The criminal process is separate from RUSM's process.

Whenever possible, Complainants should report a violation of this Policy as soon as possible and preserve evidence as may be necessary to prove that domestic violence, dating violence, sexual assault or stalking occurred, or to obtain a protection order. Complainants of sexual assault or rape are strongly encouraged to report the incident as described in this Policy to deter future assaults and to ensure that the Complainants receive the services they need. Steps should be taken to help deal with physical and emotional trauma associated with the violation. Recommended steps include:

6. Go to a safe place; go somewhere to get emotional support.
7. Consider reporting the incident to the police. Complainants are not required to report an incident to law enforcement authorities, but RUSM will assist the Complainants with contacting the police, if requested.

8. Report the misconduct to the manager of student services, sr. manager of campus operations, one-up manager, campus incident commander, local RUSM leadership, Title IX Coordinator or the CRC.
9. For your safety and well-being, immediate medical attention is encouraged. Time is a critical factor for evidence collection and reservation that may assist in proving that the alleged criminal offense occurred or may be helpful in obtaining an order of protection. Being examined as soon as possible, ideally within 120 hours, is important especially in the case of rape and other forms of sexual assault. To preserve evidence, it is recommended that, if at all possible, you do not bathe, shower, douche, eat, drink, smoke, brush your teeth, urinate, defecate or change clothes before that exam. Even if you have already taken any of these actions, you are still encouraged to have prompt medical care. Additionally, you are encouraged to gather bedding, linens or unlaundered clothing and any other pertinent articles that may be used for evidence. Secure them in a clean paper bag or clean sheet. Completing a forensic examination does not require someone to file a police report. To find a location near you that performs free forensic examinations, call the National Sexual Assault Hotline at (800) 656-4673. Resources are also available through the Rape Abuse & Incest National Network (RAINN); www.RAINN.org.
10. Even after the immediate crisis has passed, consider seeking professional counseling and the support of local and specialized support agencies, such as sexual assault recovery centers and domestic violence safe houses. This can help to recover from the psychological effects and provide a safe environment for recovery.

Resources for Victims

Local Resources can be found in the RUSM's Annual Security Report distributed to each campus community and posted on the Student Consumer Information page of RUSM's website. The reports are available by location in a drop-down menu and contain lists of local resources available to victims of sex and gender-based misconduct. The resource lists are updated annually.

To access this information, go to: <https://medical.rossu.edu/student-consumer-information>.

Additionally, the following resources exist to provide information and links to external assistance:

- **National Sexual Assault Hotline** 1.800.656.HOPE (4673) rainn.org
- **National Domestic Violence Hotline** 1.800.799.7233 (TTY) 1.800.787.3224 thehotline.org
- **National Network to End Domestic Violence** nnedv.org womenslaw.org
[Legal information and resources]
- **National Stalking Resource Center** victimsofcrime.org
- **Love is respect** 1.866.331.9474 (TTY) 1.866.331.8453 loveisrespect.org
- **National Suicide Prevention Hotline** 1.800.273.TALK (8255) suicidepreventionlifeline.org
- **Americans Overseas Domestic Violence Crisis Center** 1.866.USWOMEN (International Toll-Free) crisis@866uswomen.org
- **U.S. Embassy** usembassy.gov
- **Child Welfare Information Gateway** childwelfare.gov
- **State Statutes Including Mandatory Reporting Laws** childwelfare.gov/topics/systemwide/laws-policies/state

STUDENT RIGHTS UNDER FERPA

(The Family Educational Rights and Privacy Act)

RUSM respects the rights and privacy of its students and acknowledge the responsibility to maintain confidentiality of personally identifiable information.

FERPA is a federal law that affords students the following rights with respect to their education records. These rights include:

1. **THE RIGHT TO INSPECT AND REVIEW THE STUDENT'S EDUCATION RECORDS**

Students have the right to review their education records within 45 days of the day the institution receives their request. Students should submit to the registrar, dean, or head of the academic department a written request that identifies the record(s) they wish to inspect. The institution official will make arrangements for access and notify the student of the time and place where the records may be inspected. If the official to whom the request is submitted does not maintain the records, that official will advise the student of the correct official to whom the request should be addressed.

2. **THE RIGHT TO SEEK AN AMENDMENT OF INACCURATE OR MISLEADING INFORMATION**

Students may ask the institution to amend a record that they believe is inaccurate or misleading. They should write to the official responsible for the record, clearly identify the part of the record they believe should be changed and specify why it is inaccurate or misleading. If the institution decides not to amend the record as requested by the student, the student will be notified of the decision and advised of his or her right to a hearing regarding the request for amendment. Additional information regarding the hearing procedures will be provided to the student when they are notified of the right to a hearing. Following the hearing, if the institution still decides not to amend the record, the student has a right to place a clarifying statement in the record.

3. **THE RIGHT TO LIMIT DISCLOSURE OF PERSONALLY IDENTIFIABLE INFORMATION**

Students have the right to consent to disclosure of personally identifiable information contained in their educational records, except to the extent that FERPA authorizes disclosure without consent.

One exception that permits disclosure without consent is disclosure to a school official who has a legitimate educational interest. A school official is a person employed by the institution in an administrative, supervisory, academic, research, or support staff position (including campus security, incident commanders and health staff) or a student serving on an official committee, such as a disciplinary or grievance committee. A school official also may include an Adtalem Global Education colleague, a volunteer, or contractor outside of the institution who performs an institutional service or function for which the institution would otherwise use its own employees and who is under the direct control of the institution with respect to the use and maintenance of PII from education records, such as an attorney, auditor, intern or collection agent or a student volunteering to assist another school official in performing their tasks. School officials have a legitimate educational interest if the official needs to review an education record in order to fulfill their professional responsibilities for the institution.

Another exception that permits disclosure without consent is disclosure of directory information. Directory information is not considered to be harmful or an invasion of privacy if disclosed. See the Directory Information section for additional information.

4. **THE RIGHT TO FILE A COMPLAINT WITH THE U.S. DEPARTMENT OF EDUCATION IF THE INSTITUTION FAILS TO COMPLY WITH FERPA REQUIREMENTS**

Complaints should be directed to:
Family Policy Compliance Office
U.S. Department of Education
400 Maryland Avenue, SW

DIRECTORY INFORMATION

The Family Educational Rights and Privacy Act (FERPA) designates certain student information as “Directory Information” and gives the institution the right to disclose such information without having to ask students’ permission. The items listed below as “Directory Information” may be released for any purpose at the discretion of the institution. Under the provisions of FERPA, students have the right to withhold the disclosure of any or all of the categories of information listed below. **The following information will be released unless students specifically request that their information be withheld:**

- **Directory Information:** Name, address, telephone number, email address, date and place of birth, dates of attendance, previous institution(s) attended, major field of study (program), enrollment status, degrees and awards, past and present participation in officially recognized activities, residency obtained.

To Withhold Information

To have directory information withheld, students must submit a written request to the Registrar. Once filed, this request becomes a permanent part of the student’s record and no information may be released until the student instructs the institution otherwise.

UNAUTHORIZED DISTRIBUTION OF COPYRIGHTED MATERIALS

RUSM strives to provide access to varied materials, services and equipment for students, faculty and staff and does not knowingly condone policies or practices that constitute an infringement of Federal copyright law. Transmitting or downloading any material that you do not have the right to make available and that infringes any patent, trademark, trade secret, copyright or other proprietary rights of any party is prohibited.

Installing or distributing pirated or unlicensed software is also forbidden. Violation of these requirements may subject students, faculty and staff to civil and criminal liabilities. Students, faculty or staff who violate federal copyright law do so at their own risk. Copyright status is applied to a work as soon as it is created. Users should assume that all writings and images are copyrighted.

Title 17 of the United States Code (17 USC §501 et seq.) outlines remedies for copyright infringement that may include some or all of the following: obtaining an injunction to stop the infringing activity; impounding and disposing of the infringing articles; an award to the copyright owner of actual damages and the profits of the infringer, or in the alternative, an award of statutory damages which may be increased if the infringement is found to be willful; an award of two times the amount of the license fee a copyright owner could have gotten; an award of the full costs incurred in bringing an infringement action, and the award of attorney’s fees; and for criminal copyright infringement, fines and imprisonment.

RUSM maintains a campus network to support and enhance the academic and administrative needs of our students, faculty and staff. RUSM is required by Federal Law – H.R. 4137 to make an annual disclosure informing students that illegal distribution of copyrighted materials may lead to civil and/or criminal penalties. RUSM takes steps to detect and punish users who illegally distribute copyrighted materials.

RUSM reserves the right to suspend or terminate network access to any campus user that violates this policy and Network access may be suspended if any use is impacting the operations of the network. Violations may be reported to appropriate authorities for criminal or civil prosecution. The existence and imposition of sanctions do not protect members of the campus community from any legal action by external entities.

Alternatives to Illegal Downloading

Illegal downloads hurt artists and deter the incentive to create. U.S. laws protect the rights of individuals regarding their own works. Below are lists of sites that offer free or inexpensive products that you can use without violating copyright law.

FREE AND LEGAL

Clipart:

<http://www.coolarchive.com/>

<http://www.clipart.com/>

Fonts:

<http://www.blambot.com/>

<http://www.fonts.com/>

Photos:

<https://pixabay.com/photos/>

<https://all-free-download.com/free-photos/>

Music:

<https://www.epidemicsound.com/>



ADT^ALEM
GLOBAL EDUCATION

Code of Conduct and Ethics

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Dear Colleagues,

As members of the Adtalem Global Education community, we are guided by our TEACH Values, which inform everything we do – putting the team first (Teamwork); building positive spirit and initiative (Energy); taking ownership and responsibility for our actions (Accountability); operating with a shared sense of responsibility and empathy for others (Community); and serving our students and one another with care (Heart).

Our values of Accountability and Community are the foundation of the Adtalem Code of Conduct and Ethics. Accountability is taking ownership for our own actions, demonstrating courage to speak up regarding the actions of others if those actions do not align with Adtalem Global Education’s standards of conduct, and acting with the utmost integrity in all that we do. Our value of Community allows us to respect our shared values but also to celebrate our differences through mutual respect for all of our colleagues and students.

The way we conduct ourselves is essential to our continued success in an industry that is heavily regulated and scrutinized. Even more important, it is critical to maintaining our reputation among students as the place where they can bring their educational and career dreams to life, among colleagues as a great place to work and among our communities as an organization that is committed to Doing Well By Doing Good. Complying with international, federal, state and

local regulations is only the beginning. We should – and do – go beyond what is legally required. All of us, regardless of our level or role, are responsible for acting with the utmost personal and professional integrity every day.

Because we place such a high priority on our ethical conduct, it's important that all of us:

- Read this Code and apply it to our roles at Adtalem
- Use the Code to learn how we can ask for advice or get answers to questions about Adtalem's policies and expectations
- Keep the Code on hand for future reference

Thank you for your commitment to acting with integrity in support of our Vision, and for your dedication to our students.

Stephen W. Beard

President and CEO

Applying Our Values

Our Values – Teamwork, Energy, Accountability, Community and Heart – support a unique culture at Adtalem that sets us apart and defines who we are as an organization.

Our Culture of Care is continually renewed by the choices and actions each of us makes every day. Our Code of Conduct and Ethics ("Code"), together with our policies and other resources, is intended to help guide us when we are faced with ethics or compliance decisions or when we have questions about what to do in specific situations.

Who Needs to Follow Our Code

Our Code applies to all Adtalem colleagues including officers, directors and full- and part-time colleagues and faculty. It applies across our family of educational institutions, everywhere we operate.

The actions of customers, vendors, agents, and other third parties who work with us can have an impact on our reputation. For this reason, we strive to work only with third parties that share our commitment to ethics and compliance, and we expect them to act in a way that is consistent with our

Code. We will take the appropriate measures where we believe they have not met our high standards.



TO LEARN MORE

Adtalem Global Education's Vendor Code of Conduct.

How to Use This Code

No code of conduct can cover every possible situation, and this Code is meant to be a living document. This is why we rely on one another to use good judgment and to speak up whenever we have questions or concerns. In addition, Adtalem and each of our institutions have more detailed policies governing our day-to-day work, and you are responsible for knowing, understanding and complying with those policies in addition to this Code.

The application of each section of this Code may vary from institution to institution. When an institution's policy or local law is stricter than the standards in this Code, follow your institution's policy or local law. When in doubt, contact Integrity and Compliance for guidance or submit a question to the Speak Up HelpSite or HelpLine.

As a global organization based in the United States, we must comply with the laws of the United States, as well as the laws of the countries in which we operate. Each of us has an important responsibility to know and to follow the laws that apply to our roles in the countries in which we operate. If you are a manager, you are responsible for ensuring that your direct reports and other colleagues are familiar with the local laws and policies that apply to them. For more information about the country- or state-specific laws that may apply to you, consult with your assigned Adtalem Legal representative.

Our Expectations

Adtalem must always meet the highest standards of integrity and ethical conduct. That's why all colleagues are encouraged to:

- Hold ourselves and one another accountable for complying with the law, regulations, this Code and Adtalem and institutional policies, even when doing so could interfere with achieving a business goal.
- Pay particular attention to the policies that are relevant to their responsibilities.
- Refrain from asking anyone to do something that is improper or unethical.
- Promptly report concerns about possible violations of laws, regulations, this Code and other Adtalem policies to your manager or any of the resources listed in this Code.
- Cooperate and tell the whole truth when responding to an audit, investigation or regulatory review.
- Always comply with Adtalem's records retention policies, and never alter or destroy records other than in strict compliance with such policies.
- Once a year, read, acknowledge and commit to complying with the Code.

REMEMBER: No excuse will ever be acceptable for violating laws, regulations, the Code or our policies.

Managers' Additional Responsibilities

Colleagues who manage or supervise others have additional responsibilities, including:

- Leading by example. Be a resource for others. Talk to your colleagues and business partners about how the Code and our policies

apply to their daily work and listen to their concerns and questions.

- Working proactively and on an ongoing basis to ensure your colleagues are trained and well-versed in the rules that apply to their roles.

- Creating an environment where everyone feels comfortable asking questions and reporting potential violations.
- Encouraging your colleagues to complete training.
- If you oversee third parties working with Adtalem or any of its institutions or companies, ensuring that they understand our Code, the Vendor Code of Conduct and their responsibilities.
- Asking Integrity and Compliance for help when faced with ethical or compliance matters that you are unsure how to handle.
- Creating a work environment free of discrimination and harassment.

Q&A

I'm a manager and I'm not clear what I should do if someone comes to me with a potential breach of the Code – and what if it involves a senior leader?

No matter who the allegation involves, you are encouraged to inform appropriate personnel so that the situation can be resolved. You may use any of the avenues for asking questions and reporting concerns that are listed in the Code. If for any reason you are uncomfortable making a report to a particular person, you can report the allegation using the Speak Up HelpSite.

If I observe misconduct in an area outside of my responsibilities, what should I do?

You are responsible primarily for the people who report to you, but all colleagues of Adtalem and its institutions and companies have a responsibility to report suspected misconduct that occurs even if outside of their reporting lines and, where appropriate, intervene to deter or stop any colleague misconduct. In many cases, the best approach is to talk first with the manager who oversees the area where the problem is occurring. However, if you are concerned about this being the best approach, you should talk to your manager, an HR representative, Adtalem Legal or Integrity and Compliance; you can also report the misconduct using the Speak Up HelpSite.

Accountability Under the Code

Violating relevant laws, regulations, the Code or our policies, or encouraging others to do so, may harm our reputation and expose you to disciplinary action up to, and including, immediate termination of employment. Certain

actions may also lead to legal proceedings against you, your fellow colleagues and/or Adtalem.

Colleagues are encouraged to check with Integrity and Compliance, askHR or your local HR representative for any specific local policies regarding potential misconduct and disciplinary or investigatory procedures.

Under limited circumstances, colleagues may also be subject to discipline for conduct outside of work, including, for example, activities that are discriminatory or harassing, may damage Adtalem's reputation or may be harmful to our students.

Speak Up: Ask Questions and Report Concerns

We expect colleagues to ask questions, raise concerns and contribute actively to the prevention of colleague misconduct. We work hard to promote a culture where everyone is comfortable speaking up in good faith without fear of retaliation. So, in addition to knowing and complying with the legal and policy requirements that apply to your role, we encourage you to speak up and take action when you know or suspect there is misconduct that may impact Adtalem.

When you are faced with a difficult compliance or ethics situation or dilemma, you should first refer to this Code and to the policies that apply to your role. If, after doing so, you are still unsure, you have several options:

- Contact your manager. Be as specific and detailed as possible, so that he or she understands your question or concerns.
- Contact Integrity and Compliance.
- Contact a member of the Adtalem Legal team, your local Human Resources representative or askHR.
- Go to the Speak Up HelpSite or HelpLine to ask a question or submit a report. You have the option to remain anonymous when you ask a question or report a known or suspected violation online or by phone.

Retaliation is Prohibited

We do not tolerate retaliation against anyone for raising concerns or reporting possible misconduct in good faith or for assisting in the investigation of possible misconduct.

If you think that you or someone you know has experienced retaliation, contact your manager, an HR representative, or Integrity and Compliance; you can also report the misconduct using the Speak Up HelpSite.

What to Expect When You Use Our Speak Up Resources

The Speak Up resources, the HelpSite and HelpLine noted below, are a confidential way to obtain answers to your questions and concerns and to report possible misconduct. The HelpSite and HelpLine are operated by an

independent company, is available 24 hours a day, seven days a week, and is multilingual.

When using the Speak Up resources, you will be given the option to ask a question or make a report online or by phone. If you telephone, the operator will listen to your concern or question, ask clarifying questions if necessary and then write a summary report. The summary will then be provided to Adtalem for assessment and further action as appropriate.

After making a report, you will receive an identification number to follow up about the report. Following up is especially important if you submit your report anonymously – an option that is available in most but not all of the countries where we operate. This identification number will enable you to report back with additional information and track the resolution of the case.

All reports will be kept confidential to the extent practical, except where disclosure is required for Adtalem to investigate a report or by applicable law or legal process.

Some countries, including many in the European Union, have specific rules on the use of the Speak Up HelpSite and HelpLine, which in some cases may limit the types of reports that can be accepted.

SPEAK UP RESOURCES Helpline

U.S.: 1.800.461.9330

North America SMS: 773.904.1074

St. Kitts: 1.720.514.4400

Barbados: 1.855.203.6928

St. Maarten: 1.720.514.4400

Help Site www.speakupadtalem.com

In order for the Speak Up resources to work effectively, reports and inquiries must be made in good faith. For this purpose, good faith simply means an honest belief that a report is true and accurate, even if the facts reported prove to be false. Colleagues found to have made bad-faith reports are subject to disciplinary action, up to and including immediate termination of employment. A bad-faith report means a report by a colleague that intentionally makes false claims of misconduct by a colleague, student or third party.

Making the Right Choice

You may find yourself in a situation in which you are uncertain about what to do. It may help to ask yourself: • Is it consistent with Adtalem's TEACH

Values?

- Would you be comfortable reading about it in the newspaper or listening to it in front of a jury?
- Would it be consistent with yours or Adtalem's reputation for excellence?
- Does it seem ethical to you and to those whose opinions you respect?
- Could the conduct harm our colleagues or students in any way?
- Is it legal and consistent with our policies and our Code? If your answer to any of these questions is "no," don't do it, and contact any of the resources listed in this Code for help.

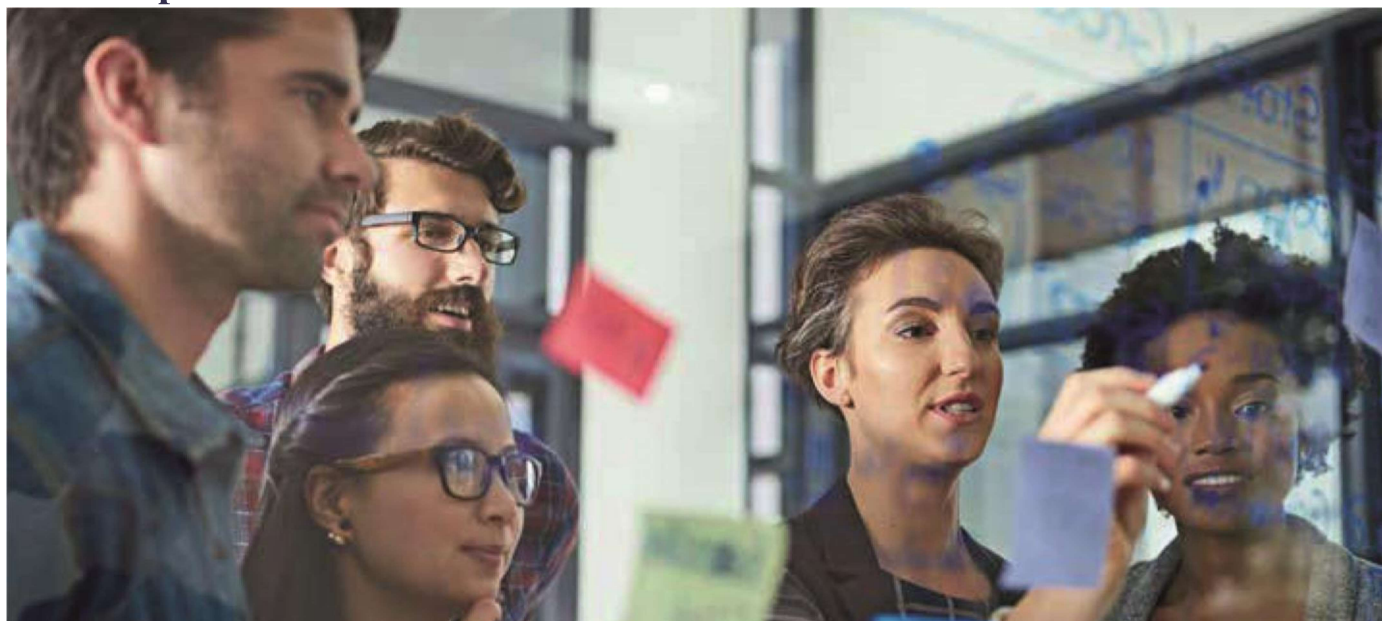
Closing the Loop

Ethics at Adtalem must continually evolve to stay current with new and emerging risk areas. Once you've made a decision, ask yourself the following additional question:

- Do you believe there are sufficient standards, policies and resources in place to address the issue you faced, or should more be done?

If your answer is "no" and you believe more should be done, contact Integrity and Compliance. Your suggestions will help us improve our Integrity and Compliance program.

Our Responsibilities to



Our Community

Through respect, collaboration and communication, we have built a dynamic team of talented colleagues. We work together with one purpose: to empower our students to achieve their educational and career goals.

Maintaining our team-based culture not only helps our students succeed, it also creates the setting for each of us to thrive personally while making a positive contribution to one another's success.

Value Diversity, Inclusion and Equal Opportunity

We value the unique contribution that each person brings to Adtalem. We treat everyone with respect and dignity and base all employment decisions on merit, experience and personal aptitude.

We do not discriminate on the basis of race, creed, color, religion, political affiliation, national origin, gender, age, disability, marital status, sexual orientation, gender identity, citizenship status or any other status protected by law.

Always Keep in Mind

- Treat everyone with respect.
- Encourage and listen to those who speak up, and work to create a culture where others feel valued and understood.
- If you manage people or are involved in recruitment and hiring, judge others based on performance, qualifications, abilities and potential.
- Avoid introducing unrelated considerations into your decisions. Use objective, quantifiable standards to the extent possible.

- Do not engage in favoritism for any reason.
- Respect colleagues' privacy, dignity and life outside of work.

Q&A

One of my colleagues sends emails containing jokes and derogatory comments about certain nationalities. They make

me uncomfortable, but no one else has spoken up about them. What should I do?

If you feel comfortable doing so and can do so safely, you should tell the colleague to stop the behavior. You are also encouraged to report your concerns to your manager, askHR or your local HR representative. You can also report your concerns on the Speak Up HelpLine or HelpSite. Sending such jokes doesn't support our core Values, and it violates our policies. By doing nothing, you are silently supporting behavior that can seriously erode the team environment.

Avoid Harassment and Intimidation

We treat our fellow colleagues with dignity and respect at all times. We do not tolerate any form of harassment or intimidation. This includes actions that can reasonably be considered as offensive or discriminatory, as well as any form of sexual harassment.

Always Keep in Mind

- Maintain a work environment that is professional and free from harassment.
- If possible and you can do so safely, be direct. Speak up and tell a person if you are upset by his or her actions or language, explain why and ask him or her to stop. You are encouraged to report your concerns to your manager, askHR or your local HR representative, or use the Speak Up HelpLine or HelpSite.
- Don't create, distribute or display obscene or discriminatory material, including written, recorded or electronically transmitted messages (such as email, instant messages and internet materials).
- Remember – harassment can occur between individuals of the same or different races or genders and can involve individuals or groups of colleagues.

Sex and Gender Misconduct, and Bullying

Adtalem is committed to maintaining an educational environment that is free from sex and/or gender misconduct. Sex and gender misconduct includes sexual harassment, sexual assault, rape, domestic violence, dating violence, stalking, sexual exploitation, and gender-based harassment. When a student has been a victim of sex and/or gender misconduct – even if the act did not occur on Adtalem property – it can impede his or her ability to fully participate in the educational benefits that we provide. Therefore, it is important that we all do our part to prevent all forms of sex and gender-based misconduct and support our student and colleague survivors.

Some colleagues have an affirmative duty under applicable law to report potential incidents of sex and/or gender-based misconduct. See Policy on Sex and Gender Based Misconduct Response and Prevention.

For more information, or if you have questions, contact the Title IX Coordinator at TitleIXCoordinator@adtalem.com or use the Speak Up HelpLine or HelpSite by calling 1.800.461.9330 or going to www.speakupadtalem.com.

Watch Out for These Red Flags

- Unwanted sexual advances or requests for sexual favors.
- Offensive physical contact such as patting, grabbing, pinching or brushing against another's body.
- Making sexual gestures and displaying offensive, sexually suggestive objects or pictures, cartoons or posters.
- Offensive, sexually oriented verbal kidding, teasing or jokes.
- Verbal abuse, threats or taunting based on a colleague's appearance, sexual orientation, beliefs or other characteristics protected by our policies and applicable laws.
- Intimidating or insulting behavior that humiliates, undermines or threatens another colleague, whether intentional or unintentional.

Q&A

While on a business trip, a colleague repeatedly asked me out for drinks and made comments about my appearance that made me uncomfortable. I asked him to stop, but he wouldn't. We weren't in the office and it was after hours. What should I do?

This type of conduct is not acceptable, regardless of whether it takes place in Adtalem's offices. Adtalem supports a work environment free from harassment, so don't wait for it to happen again to address it. If you feel safe and comfortable doing so, be firm and tell your colleague such actions are inappropriate and must be stopped. We take these matters very seriously and encourage you to report the problem to your manager, your local HR representative or askHR, or use the Speak Up HelpSite or HelpLine.

During my recent performance review, my manager was highly critical of my performance and I felt intimidated and bullied by the tone of the comments. Is this a violation of the Code and our policy against harassment?

Likely not. Bullying and intimidation are never acceptable, even during a manager's performance evaluation or while disciplining direct reports. However, articulating colleague performance expectations with statements such as "unless you improve your performance, your employment may be terminated" is not considered bullying or intimidation. If you have questions or concerns, you should contact askHR or your local HR representative, or use the Speak Up HelpLine or HelpSite.

Appropriate Relationships

Adtalem is committed to fostering workplace and academic environments that enhance our students' educational goals, our professional experiences

and the reputation of our educational institutions. For this reason, we expect colleagues to uphold the following standards for maintaining appropriate relationships in the workplace.

Colleague-to-colleague relationships

Colleagues are expected to refrain from hiring or otherwise working in the same reporting line with their own family members, spouses, relatives, domestic partners or with colleagues or third parties with whom they have a romantic or intimate relationship. Likewise, it is not acceptable for you to engage in an intimate relationship with another colleague if you can influence or control that colleague's professional or financial interests.

Colleague-to-student relationships

Under no circumstances are faculty members, administrative personnel or other colleagues permitted to engage in any romantic or intimate relationships with prospective or current students if they do at the time, or may in the future be able to, influence or control enrollment, counseling, supervisory, or grading activities or decisions affecting that student. You are encouraged to report improper relationships between students and colleagues to askHR, your local HR representative, Integrity and Compliance or via the Speak Up HelpLine or HelpSite.

Some institutions may have stricter standards regarding appropriate relationships than those set out in this Code.

Where that is the case, the stricter standards prevail.

For more information, or if you have questions, contact the head of academic affairs for your institution, askHR or your local HR representative, or use the Speak Up HelpLine or HelpSite.

Keep One Another Safe and Secure

Everyone – colleagues, students and visitors to our facilities – has a right to expect a safe and secure environment. A safe and secure environment is a critical part of providing a quality education for our students.

All colleagues and third parties who work with Adtalem are expected to understand and follow our safety and security policies and procedures. We must work together to keep our workplace free from hazards and foreseeable and preventable risks.

Adtalem provides each location with a set of standard requirements and procedures designed to keep colleagues safe. We also provide a framework for each location to follow when responding to incidents.

In addition, each campus has a designated Incident Commander who serves as the primary point of contact with regard to safety and security matters. For more information, or to raise a concern or report an incident, contact your local Incident Commander, your local campus leader, your local security department, or Adtalem's Security Office.

Always Keep in Mind

- Be alert to safety and security risks.
- Violence of any kind has no place at Adtalem. We will not tolerate any acts or threats of physical violence against co-workers, students, visitors or anyone else on our property, during business travel or at Adtalem, institution or company-sponsored events.
- Firearms or other weapons are not permitted on Adtalem property, parking lots, alternate work locations maintained by Adtalem, at Adtalem institution or company-sponsored events, unless the application of such policy would be prohibited by law.
- Maintain a neat, safe working environment by keeping work stations, aisles and other work spaces free from obstacles, wires and other potential hazards.

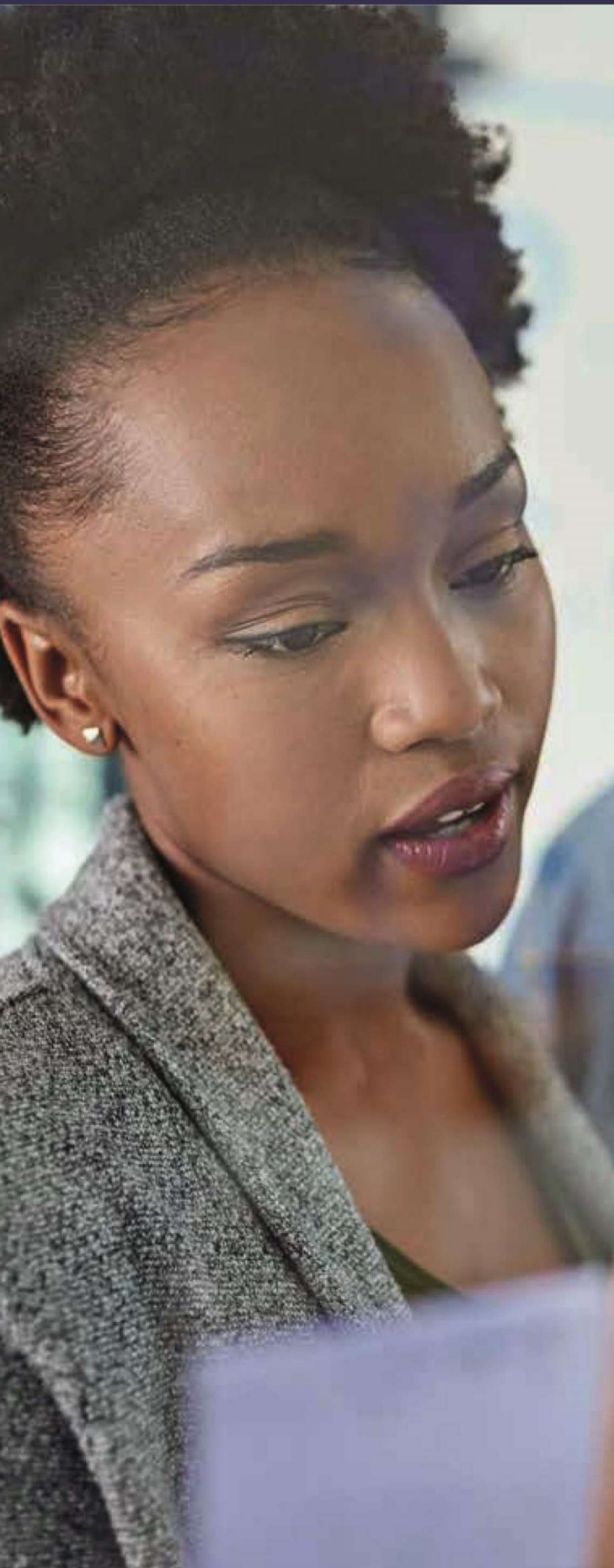


TO LEARN MORE

Adtalem Global Education's Colleague Handbook, "Substance Abuse" section.

Drug and Alcohol Use

The use of illegal drugs and alcohol goes against our commitment to a safe, healthy, secure and productive environment for colleagues, students and community. When your ability to do your job is impaired by the misuse or abuse of alcohol or drugs, you jeopardize the safety of others and potentially harm our reputation. While at work or on Adtalem business, you should be alert, not impaired, and always ready to carry out your work



duties. You should always respect local customs and laws pertaining to drug and alcohol use.

Accommodations

Consult with askHR or your local HR representative if you must take legal medications that could negatively affect your job performance in a material way or compromise someone's safety.

Alcohol and drug-related support

If you have a drug- or alcohol-related problem, we encourage you to seek assistance. If you are outside of the United States, please see your local HR representative. Alternatively, you can download and access the Ginger Emotional Support app: In the app, tap "Get Started," and enter your work email address. Follow the instructions sent to your inbox. From there, Ginger will work with you and recommend the level of support that is recommended. Additionally, if you are enrolled in an Adeptum medical plan, you can seek treatment directly on your own.

Q&A

Are subcontractors working on our premises expected to follow the same safety and security policies and procedures as colleagues?

Absolutely. Managers are responsible for ensuring that third parties at work on our premises understand and comply with all applicable policies, laws and regulations affecting that particular campus or location.

Respect Privacy and Protect Personal Information

We respect and protect the privacy of everyone who entrusts us with his or her personal information. This includes prospective, current and former students, our colleagues and third parties. Protecting this information is a legal requirement and a matter of trust.

As a global organization in a digitally connected environment, we respect all applicable laws relating to data privacy and security. Some information, generally referred to as Personally Identifiable Information (PII), requires an extra degree of care. PII is any data that could, by itself or in combination with other information, be used to identify an individual.

Always Keep in Mind

- Be accountable for protecting PII and stay informed about our PII-related policies.
- Only share personal information, including PII, with those who have a legitimate need to know and whose access is appropriately authorized.
- Never disclose a student's government-issued identification number; credit or debit card numbers or passwords.
- Never disclose academic records or student information to outside parties without the student's consent, unless required by law or as permitted in limited circumstances under our applicable policies.
- Be transparent about our privacy practices and how individuals can contact us with questions or concerns.
- Promptly report any actual or suspected unauthorized uses, disclosures or access to PII to your manager or to Integrity and Compliance.
- Never prohibit a student from reviewing his or her own academic records.
- Always ensure that third parties working with Adtalem are required to and do comply with our privacy policy requirements.
- Where you believe we are transferring or will transfer personal information from one country to another, contact Integrity and Compliance to be sure you understand applicable policies, laws and regulations



TO LEARN MORE

Contact Adtalem's Privacy Team
Adtalem's Privacy and FERPA Policies
Adtalem Global Education's Colleague Handbook, "Keep It Confidential" and "Protect Your Work" sections

neglecting his or her duty to protect the confidentiality of others. Similarly, you should never leave laptops or other electronic portable devices unattended, especially if they contain sensitive information. It takes only a few seconds for someone to do serious damage to your computer or your files or to access information on the computer, so take the time to lock your computer when you leave your desk.

Use Our Assets Wisely

We all have a responsibility to be efficient and economical in the use of resources and protect against the abuse of organizational assets to make sure they are used and cared for appropriately.

Adtalem assets include our buildings, equipment, vehicles, computers, phones, mobile devices, files, documents, inventory and supplies. Our assets also include intellectual property as well as our confidential and proprietary information.

Proper Use of Information Technology

Each of us must use Adtalem's electronic systems and resources in a manner that does not expose the organization to the risk of security breaches, legal claims, sabotage, computer viruses or similar problems.

Infrequent and incidental personal use of Adtalem electronic systems and resources is permitted as long as it does not interfere with your duties or your productivity and does not consume or divert resources that could otherwise be used for organizational purposes.

Always Keep in Mind

- Only use software that has been properly licensed. The copying or use of unlicensed or "pirated" software on Adtalem's electronic systems and resources is strictly prohibited.
- Report any suspected theft, embezzlement or misappropriation of any Adtalem property using the Speak Up HelpLine or HelpSite.
- Never sell, transfer, destroy or otherwise dispose of Adtalem assets or materials (including computers, equipment, and electronic and hard-copy records) without proper documentation and authorization.

Q&A

A report I found on the photocopier contains a lot of confidential personal records, including student identification numbers. I also often pass by computers where I can see confidential information on the screens. I do not want to get anyone into trouble, but I do not think it is right that this kind of information is left for all to see. What should I do?

You should immediately retrieve the document from the copier and deliver it to the document owner. If you don't know who the document owner is, contact your manager, your local HR representative or Integrity and Compliance for guidance. Protecting confidentiality and privacy is the responsibility of every colleague. When papers containing confidential information are left on the copier, the person who left them there is

**TO LEARN MORE**

Adtalem Global Education's Colleague Handbook, "Use Our Tools Responsibly" section

Maintain the Highest Standards of Academic Integrity

As a global provider of educational services, we are committed to providing our students with high-quality instruction and related services and support. In order to maintain this quality, we must uphold the highest standards of academic integrity.

Always Keep in Mind

- Use the work product of others in a proper manner and with proper authorization and/or citation.
- Forgo intentionally or knowingly helping or attempting to help another to commit any act of academic dishonesty.
- Maintain educational records and the academic standing of students properly.
- Refuse any offer of a bribe, gift or gratuity of any kind from any prospective or current student, and refrain from doing so on a prospective or current student's behalf.

**TO LEARN MORE**

In addition, student finance colleagues are also expected to adhere to the Student Finance Code of Conduct. For more information, contact Adtalem's Regulatory Compliance team.

Marketing, Advertisement, Recruitment and Admissions

The laws governing advertising and marketing activities are proscriptive. If you are involved in developing or using our marketing, advertising or promotional material, it is important that you understand the guidelines that relate to these activities. The same is true for any third parties creating such materials on our behalf.

We provide truthful, accurate and non-misleading information to prospective students, and we base admission solely on each applicant's ability to meet admission requirements, which vary by institution. We honor and properly document requests of students or other consumers not to be contacted by us via email, phone or other methods.

When recruiting prospective students, we provide responsible, objective and unbiased information. We are always truthful and never misleading, following



the tenets of Adtalem's Responsible Communications policy and training. We hold ourselves to these high standards not just because it is the law, but because it is the right thing to do to help our students achieve their educational and career goals.

As a provider of higher education, Adtalem is subject to extensive regulation. In order for Adtalem's degree-granting institutions and our students to remain eligible to participate in U.S. federal financial aid programs, we must abide by regulations that govern compensation for colleagues who recruit students.

Always Keep in Mind

Our Responsibilities to Our Partners and the Public

We want to be known as a trusted neighbor in the communities where we operate. We have a commitment to transparency and responsible business practices.

We always keep in mind our obligations to our shareholders, our business partners and the public, and we remain guided by our Values and our respect for the laws governing our operations everywhere we operate.

Serve the Greater Good

We are proud that as educators, the very nature of our work serves the greater good and makes a positive contribution to society and the lives of our students. As global citizens, we are committed to:

- Supporting social and educational initiatives in the communities in which we live and work
- Participating in relief efforts and service projects around the world
- Complying with the relevant environmental laws and regulations applicable in each country in which we operate
- Considering environmental responsibility as a factor in our decisions including recycling, conserving resources and working with our business partners
- Managing and minimizing our impact on the environment

- Comply with all applicable legal requirements and Adtalem policies and approval procedures when developing or implementing public relations, marketing, and advertising materials.
- Be sure all materials are truthful, complete, accurate, properly substantiated and not misleading.
- Provide supporting data and qualifying language when using statistics.
- Clearly state that the education offered is not a guarantee of employment or "success."



Build Lasting Business Relationships

We believe in working with business partners who share our commitment to high standards of ethics and integrity.

Our business partners – including our suppliers, vendors, representatives, and agents – represent us in the marketplace. If they act illegally or unethically, it can expose us to legal repercussions and/or damage our reputation.

Always Keep in Mind

- Make supplier-related decisions in the best interest of Adtalem and not for any personal benefit or gain.
- Be responsive to all reasonable requests from our business partners, but never do something that you regard as unlawful or contrary to laws, regulations, the Code or our policies.
- Respect the confidential information and intellectual property of others.
- Choose vendors and other third parties carefully, and never work with prohibited countries, organizations or persons.
- Watch for and report any signs that our business partners are violating applicable law or regulations.
- Be sure to follow Adtalem policies and procedures before you sign any contract with a third party for Adtalem or your institution.



TO LEARN MORE

Adtalem Global Education's Supply Management Policy
Adtalem Global Education's Vendor Code of Conduct
Adtalem Global Education's Colleague Handbook, "Authorization Required for Contracts and Agreements" section

Safeguard Confidential Information

When managed properly, our information can help us develop and administer quality educational programs and meet our objectives. When information is mismanaged, it puts our organization at risk.

Each of us must be vigilant and safeguard our confidential information as well as the confidential information that is entrusted to us by others such as our students. Depending on the situation, this can include strategic ideas, organizational plans, student records and other types of information gathered or generated as part of our operations and educational efforts.

We respect all patents, trademarks, copyrights, proprietary information and trade secrets, as well as the confidentiality of anyone with whom we do business.

Always Keep in Mind

- Use and disclose confidential information only for legitimate business purposes.
- Properly label confidential information to indicate how it should be handled, distributed and destroyed.

- Protect intellectual property and confidential information by sharing it only with authorized parties.
- Never discuss confidential information when others might be able to overhear what is being said – for example, on airplanes, in elevators or in other public places – and be careful not to send confidential information to unattended fax machines or printers.
- Follow all policies, procedures and retention schedules related to records and information management.
- Secure laptops, portable devices and storage media that may contain confidential or proprietary information, and follow all network and information-security policies and protocols.
- Report any potential data security breach to your manager, the senior manager of information governance or the chief information security officer.

Intellectual Property

We work hard to create and promote brands and educational programs that are recognized around the world. Our intellectual property, such as our copyrighted material and our trademarks, is a critical part of our identity and our operations; we must handle it responsibly and safeguard it.

Other examples of our intellectual property include:

- Logos
- Marketing and advertising materials
- Branding
- Course curricula
- Educational materials

If you are responsible for developing intellectual property, consult with your assigned Adtalem Legal representative.



TO LEARN MORE

Adtalem Global Education's Colleague Handbook, "Keep It Confidential" and "Protect Your Work" sections

Avoid Insider Trading

Some Adtalem colleagues may have access to information about the organization's finances or material, non-public information that might impact our economic future. We use material, non-public information in compliance with securities laws and do not trade in the securities of any public company – including Adtalem – when we are in possession of non-public, material or price-sensitive information.

"Material, non-public information" generally refers to any information that is not available to the public and that a reasonable investor would consider

important when deciding whether to buy, sell or hold a share. This can include news about acquisitions, financial results, important management changes, commencement or termination of major contracts as well as news about the financial, operational or environmental performance of an organization. It is important to know that material, non-public information can also be confidential information about another organization that you have obtained during the course of your work.

Always Keep in Mind

- Never use, for your own or others' benefit, any organization's information that has not been made public.
- Be careful when others request confidential information about Adtalem or our business partners. Even casual conversations could be viewed as illegal "tipping" of inside information.
- Never use material, non-public information to make investment decisions or to provide investment tips to family members, close relatives, friends or other third parties.
- Securities law violations are taken seriously and can be prosecuted even if the amount of money involved is small or when the "tipper" made no profit.



TO LEARN MORE

Adtalem Global Education's Insider Trading Policy

Keep Accurate Books and Records

We are committed to transparency and to making full, accurate, timely and understandable disclosure on all aspects of our organization, including financial reports that are filed with or submitted to regulatory authorities.

Colleagues with roles that involve the preparation of our public, financial and regulatory disclosures have special responsibility in this area, but all of us contribute to the process of recording organizational results and maintaining documents. Each of us is responsible for helping to ensure the information we record is accurate, complete and maintained in a manner consistent with our system of internal controls.

As a publicly held organization, we are required to report financial information in accordance with generally accepted accounting principles, and to maintain books and records that accurately and fairly reflect all transactions. This obligation, however, includes more than just financial information. Some examples include accurately recording enrollments, attendance, grades, communications, tuition, regulatory data and other essential organizational information.

Always Keep in Mind

- Fully comply with all laws, external accounting requirements and Adtalem policies and procedures for reporting financial and other organizational information.
- Never make false claims on an expense report or time sheet. • Be clear, concise, truthful and accurate when recording any information.
- Draft internal documents and communications as if they will be reviewed by third parties. Remember that our internal records are sometimes read by third parties and governmental agencies, so we should do our best to ensure that what we write will not be misinterpreted.
- Maintain all organizational records for legally required minimum periods and in accordance with Adtalem's records-retention procedures.
- Only destroy documents in accordance with the Adtalem records-retention policies and procedures, and be aware of special limitations or requirements that may be in place for records relating to potential or ongoing litigation, investigations or audits.
- Cooperate with Adtalem's internal and external auditors.

Q&A

At the end of the last quarter reporting period, my manager asked me to record additional expenses even though I had not received the invoices from the supplier and the work had not started. I agreed to do it, mostly because I did not think it really made a difference since we were all sure that the work would be completed in the next quarter. Now I wonder if I did the right thing.

Costs must be recorded in the period in which they are incurred. The work was not started and the costs were not incurred by the date you recorded the transaction. It was therefore misleading and, depending on the circumstances, could be considered fraud. In such a situation, you should report the matter to your local HR representative or askHR, or use the Speak Up HelpSite or HelpLine.

Always Keep in Mind

- Colleagues must conduct business in accordance with fair trade practices and applicable fair competition and antitrust laws.
- Fair competition or antitrust laws are very complex and the risks of non-compliance can be severe. Contact with competitors should be limited and must always avoid certain subjects, including any matter relating to competition, such as markets, customers or prices. If such a conversation begins, leave the meeting immediately and report it to your Adtalem Legal representative or Integrity and Compliance.

Watch out for these Red Flags

Colleagues must not:

- Collude with other bidders ("bid rigging") in any tender, such as agreeing on who will be the successful bidder or the contract price.
- Collude with competitors to fix prices or to agree with a competitor not to do business with a supplier or a customer. • Illegally exchange with competitors sensitive information, such pricing, costs or other confidential proprietary information regarding Adtalem plans.
- Agree with a competitor to divide or carve up academic programs or calendars, or geographic markets or regions.
- Use a third party to pass information to a competitor.
- Engage in any other conduct which may violate any relevant competition or antitrust laws, rules or regulations in all relevant jurisdictions.

Compete Fairly

At Adtalem, we compete vigorously, but we do so fairly and honestly. It is critically important that we comply with antitrust and competition laws everywhere we operate.

Antitrust laws – also known as fair competition laws – regulate certain types of practices to ensure that consumers are given a choice in the marketplace, and that they are not subject to predatory or discriminatory practices. Violations of antitrust laws can carry severe fines and penalties.



Q&A

I received sensitive pricing information from one of our competitors. What should I do?

You should contact your manager and your Adtalem Legal representative before taking any further action. It is important that from the moment we receive such information, we demonstrate respect for antitrust laws and make clear that we expect others to do the same. This requires appropriate action that can be decided only on a case-by-case basis.

I am planning to attend a trade show. Are there any special precautions I should take to avoid a potential antitrust problem?

Trade association meetings and other industry gatherings typically serve perfectly legitimate and worthwhile purposes. However, these meetings also provide a potential pitfall under competition and

antitrust laws because they bring together competitors who may be prone to discussing matters of mutual concern. You must be especially careful to avoid discussions or exchanges of information relating to competitive matters. If competitors are discussing these matters, you should excuse yourself.

Gathering Business Intelligence

When collecting business intelligence, colleagues and others who are working on our behalf must always abide by the highest ethical standards. Never engage in fraud, misrepresentation or deception to obtain information or use invasive technology to spy on others. Be careful when accepting information from third parties, and be sure that the knowledge they provide is not protected by trade secret laws or non-disclosure or confidentiality agreements.

When gathering information on a competitor, you must never:

- Seek out confidential information of a competitor or someone outside the organization.

- Purchase confidential information related to a competitor.
- Use confidential information obtained inadvertently or accidentally.
- Request to see confidential bids submitted by competitors.
- Invest in a competitor to gain access to confidential information.

While we may employ former colleagues of competitors, we always recognize and respect the obligations of those colleagues not to use or disclose the confidential information of their former employers.

Avoid and Disclose Conflicts of Interest

A conflict of interest exists when your private interest interferes in any way – or even appears to interfere – with the interests of Adtalem and its institutions or companies. A conflict of interest may also exist when your interests or activities affect, or appear to affect your ability to make objective decisions for Adtalem and/or any of its institutions or companies. You are expected to use good judgment and avoid situations involving conflicts of interest, which can undermine the trust that others place in us and damage our reputation.

Conflicts of interest are not always clear. If you have a question, talk to your manager or to Integrity and Compliance. Even if you only think a conflict of interest might exist, you should disclose the situation to Integrity and Compliance so that they may properly evaluate, monitor and manage the situation.

Always Keep in Mind

- Always make business decisions in the best interest of Adtalem, its institutions and companies.

- Disclose to Integrity and Compliance any relationship, outside activity, financial interest or other situation that may present a possible conflict of interest or the appearance of a conflict of interest.
- Proactively address situations where you or a family member's financial interests may conflict with Adtalem's best interests.

The following are common examples of potential conflicts of interest; these and others may also be described in local Adtalem policies.

Business Opportunities

If you learn about a business opportunity because of your role with Adtalem or any of its institutions or companies, that opportunity belongs to Adtalem and/or the institution or company. Colleagues may not take for themselves, or direct to any third party, opportunities that are discovered as a result of their role with Adtalem.

Personal Relationships

Engaging in or maintaining inappropriate personal relationships with fellow colleagues, or with prospective or current students, may create a conflict of interest. Examples of personal relationships that may lead to conflicts of interest include family relationships and romantic/intimate relationships. Personal relationships that interfere with your ability to objectively perform your role should be avoided, but should be disclosed if they do occur. (See the "Appropriate Relationships" section of this Code for more details.)

Outside Employment

We do not prohibit colleagues from engaging in all outside employment. However, certain activity may involve a conflict of interest and should be disclosed and approved by Integrity and Compliance.

Some examples include:

- Any outside employment that affects your job performance.
- Employment of any kind (including consulting or faculty positions) with a competitor, supplier or customer. (Some exceptions may exist for faculty members. Contact your head of academic affairs for more information).

Personal Investments

Colleagues are not permitted to have a substantial ownership interest in any organization that may or does work with Adtalem. This rule applies to direct and indirect ownership.

A "substantial ownership interest" is an ownership interest of greater than 5 percent of total net worth of the colleague and immediate family members, or greater than 1 percent of the outstanding equity securities of a public company. There are exceptions to this rule for investments that are made

through mutual funds or managed accounts where you do not make specific investment decisions.

Civic Activities

Colleagues may be invited to serve as members of boards of directors, advisory boards or committees related to another organization. Approval may be granted if the outside organization does not compete with Adtalem and if the obligations to serve can be met on your own time. In all such cases, the civic activity should be disclosed to your manager and to Integrity and Compliance.

Circumstances can change and new conflicts can surface over time, which is why it is important to reassess your situation from time to time and discuss any potential conflicts with your manager and Integrity and Compliance.

Exchange Only Appropriate Gifts and Entertainment

When handled properly, appropriate and reasonable gifts and entertainment can strengthen business relationships. But when abused, they can damage our reputation, harm our business and may even be illegal.

Gifts and entertainment may only be exchanged if they are reasonable complements to business relationships, are consistent with Adtalem's policies, are legal and are acceptable under the policies of the recipient's organization.

Always Keep in Mind

- Only provide and accept gifts and entertainment that are reasonable complements to business relationships.
- Do not solicit personal gifts, favors, entertainment or services.
- With the exception of nominal expressions of gratitude such as a thank-you card or flowers, colleagues should never accept a gift from a current or prospective student.
- Faculty and students may wish to assemble to celebrate the end of a semester or other academic achievement. Such events are permitted, provided that:
 - The event adheres to the institution's Values.— Students do not purchase food, beverages or alcohol for faculty members.
 - The event conforms to the expectations set forth in the "Appropriate Relationships" and "Safety and Security" sections of this Code.



- Personal gifts or entertainment exchanged between colleagues are not subject to the Gifts and Entertainment policy. However, these items should never be charged as a business expense or otherwise purchased with Adtalem resources.

Types of Gifts and Entertainment That are Never Allowed

The following examples of prohibited gifts and entertainment apply to colleagues, students and third parties.

- Gifts or entertainment that are lavish or frequent.
- Gifts or entertainment from a source of student lending.
- Cash or securities, such as stocks or bonds.
- Gifts or entertainment that are sexually oriented.
- Any gift or entertainment that amounts to a quid pro quo (i.e., I will give you this if you give me that).
- Entertainment or events that do not include a business-related benefit or educational component, including non-business-related events involving travel and lodging that are covered by a third party.

In addition, colleagues who are responsible for recruitment, admissions or financial aid advising activities must never accept a gift or entertainment of any value.

Gifts and Entertainment of Government Representatives

We should never directly or indirectly offer, promise or grant anything of value to a government representative to influence any business decision or to obtain improper advantage.

Always make sure that you know whether you are dealing with a government representative or government-related entity. This is not always obvious. Businesses such as airlines, oil companies, hospitals, colleges, universities, K-12 schools and telecommunications providers may be owned or controlled by a government. When in doubt, discuss the situation with your Adtalem Legal representative or Integrity and Compliance.



TO LEARN MORE

If you ever have questions about whether or not a gift or entertainment is acceptable, discuss the matter with your manager or contact Integrity and Compliance. Adtalem's Gifts & Entertainment Policy; Adtalem's Anti-Bribery and Anti-Corruption Policy
Adtalem Global Education's Colleague Handbook, "Gift Restrictions" section

Engage in Responsible Public Communications

Adtalem is a publicly held organization and a member of the New York Stock Exchange.

Therefore, it is common for Adtalem to receive inquiries from the investment community, government agencies and the media on a variety of topics. Due to the sensitive nature of our information, as well as securities laws and other laws related to disclosure of information, we must closely manage when and how we share our information and communicate with the investment community, the government and the media. Only authorized persons may speak with, reply to or send information to the media, government or members of the investment community on behalf of Adtalem.

Inquiries from the investment community and media should be handled only by colleagues who are expressly authorized to handle such inquiries. All media or investment inquiries received by Adtalem or one of its institutions should be forwarded to the public relations, communications or media affairs representative within the institution.

Always Keep in Mind

- Public communications include social media platforms. You may use social media platforms for organizational reasons only when you are expressly authorized to do so by Adtalem or one of its institutions.
- Conferences and external presentations are an excellent way to share our expertise with others, but they should be reviewed by management and may need to be reviewed in advance by Regulatory Affairs. Submit presentations via email to responsiblecommunications@adtalem.com.

Social Media

- There are a limited number of colleagues who are authorized to respond or otherwise speak on behalf of Adtalem, and those who do so should use only Adtalem-managed social media outlets for that purpose.
- If you read an online comment about Adtalem that you believe is wrong, do not respond. Adtalem's External Relations department regularly monitors external content and will respond appropriately.
- Be thoughtful in all your communications online, including through social media. Never harass or post discriminatory comments (as defined by our anti-harassment/ anti-discrimination policies), or threaten fellow colleagues, students or anyone else. Harassing, threatening or similarly inappropriate conduct that violates Adtalem's policies is discouraged in general and is never allowed while using Adtalem equipment or during your working time.
- Personally managed social media outlets or websites may not be used to advertise, promote, recruit for or support the business of Adtalem in any way.



TO LEARN MORE

For more information, or when in doubt, contact a senior member of Adtalem's Global Communications or Investor Relations team. Adtalem's Anti-Harassment & Non-Discrimination Policy Adtalem's Policy Against Harassment, Discrimination and Retaliation (CALIFORNIA COLLEAGUES)

Our Responsibilities as an International Organization

We work together with governments and local communities and do our part as a responsible international organization to contribute to sustainable growth while providing employment to colleagues and creating opportunities for our students and others.

Avoid Corruption and Bribery

Adtalem has a zero-tolerance policy toward bribery and corruption. Bribery and corruption in all forms are completely contrary to our Values, the Code and our policies.

We comply with the Foreign Corrupt Practices Act (FCPA) and all other global laws and regulations which prohibit corruption and bribery internationally, and we support efforts to eliminate bribery and corruption worldwide. We work hard to make sure that our business partners share our commitment.

Colleagues and third parties acting on our behalf are not permitted to promise or provide anything of value to a colleague or a government official for the purpose of gaining an unfair advantage.

Likewise, colleagues and our third parties are also prohibited from receiving bribes from any third party for the purposes of gaining an unfair advantage.

Bribery is a crime in the countries where Adtalem, our institutions and companies operate, and penalties can be severe. If you have questions or concerns, discuss them with your Adtalem Legal representative or Integrity and Compliance.

Always Keep in Mind

- Do not offer or accept bribes or any other kind of improper payment, including facilitation payments.

- Keep accurate books and records so that payments are correctly described and Adtalem funds are not used for unlawful purposes.
- Know who you are doing business with and confirm that appropriate due diligence has been conducted on third parties.
- Never do anything through a third party that you are not allowed to do yourself.



TO LEARN MORE

Adtalem Global Education's Colleague Handbook, "Gift Restrictions" section
Adtalem Global Education's Anti-Bribery & Anti-Corruption Policy

However, there are strict and complex regulations governing political activity. For this reason, you should be careful when involved in political activities and understand your responsibilities to Adtalem Global Education. Lobbying activities for or on behalf of Adtalem Global Education may be conducted only by or at the express, written direction of the Government Relations organization.

Always Keep in Mind

- You may be involved in lobbying if you:

Q&A

I have questions about the use of third parties who may be go-betweens helping us with local government authorities. What should I do to make sure that they do not get us into trouble?

You are right to be concerned. Control over agents and other third parties who are operating on Adtalem's behalf is important. We should ensure that their reputations, backgrounds and abilities are appropriate and meet our ethical standards. Agents and third parties are expected to act in accordance with the requirements set out in this Code. You should never do anything through a third party that you are not allowed to do yourself.

Sometimes when I am traveling, I see practices that I would consider inappropriate, but they are common practices in the country I am visiting. What should I do if I am asked to provide what I consider to be a bribe but what the locals think of as a common business courtesy?

You should decline and inform the person that your organization's policies prohibit you from making such payments. Remember: No matter where you are, our policies apply. You should never provide a payment or anything of value to gain an improper business advantage.

Engage With Care in Political Involvement

We respect the right of colleagues to participate voluntarily in the political process, including making their own personal political contributions and expressing their personal political views.

- Communicate in any way with legislators, regulators or other government officials in any way. - Attempt to influence legislative or regulatory action. - Provide gifts or entertainment to legislators, regulators or other government officials.
- Political donations, including donations to politicians, campaigns, trade groups or associations, and political parties, on behalf of Adtalem and its institutions may be made only by or at the express, written direction of the Government Relations organization.
- Receive all necessary approvals in writing before using any Adtalem, institution or company resources to support lobbying or other political activities.
- Make sure that your personal political views and activities are not viewed as representing Adtalem.
- Seek guidance from the Government Relations organization before providing any gifts or entertainment to public officials or hosting an event that will be attended by public officials.

See also the “Gifts and Entertainment of Government Representatives” section of this Code.

- Do not use Adtalem resources or facilities to support your personal political activities.

Watch Out For These Red Flags

- Never apply direct or indirect pressure to another colleague to contribute to, support or oppose any political candidate or party.
- Avoid even the appearance that you are making political or charitable contributions in order to gain favor or to exert improper influence.
- Holding or campaigning for political office might create a conflict of interest. Be sure to disclose such activities to your manager or a senior member of the Government Relations team.



TO LEARN MORE

Discuss any questions or concerns about personal political contributions or political activities with your manager or Adtalem's Government Relations organization. If you need more information you should review Adtalem Global Education's Colleague Handbook, “No Solicitation Policy” section.

Operate Globally with Integrity

We must always operate with transparency and comply with all laws governing global trade.

The laws governing trade across international borders, including imports and exports and the transfer of technology, are extensive and complicated. The sanctions for violating these laws can be severe, up to and including substantial fines and/or imprisonment.

Always Keep in Mind



Adtalem colleagues and third parties acting on our behalf are expected to:

- Follow all applicable trade laws and regulations in the countries where we operate.
- Consult with your Adtalem Legal or Integrity and Compliance representative before transferring goods, equipment, data or technology of any kind across borders or to individuals from other countries, even if they are in the U.S.
- Never engage in any financial transactions that promote or result from criminal activity.
- Be alert to efforts to receive, transfer, transport, retain, use, divert or hide the proceeds of any criminal activity.
- Report any suspicions that such criminal conduct has occurred to Integrity and Compliance or your Adtalem Legal representative.

Q&A

I will be attending a fundraiser for a candidate for local office. Is it acceptable to list my position at Adtalem on the attendee list and in the program as long as I don't use any organization funds or resources?

In some jurisdictions, you may be required to list your employer when making a personal political contribution, including when you attend fundraising events. However, apart from such legal requirements, you should make it clear that your personal political activities are distinct from those of Adtalem.

I would like to invite an elected official to speak at an upcoming Adtalem event. Would that be a problem?

You should get approval from Government

Relations before inviting an elected official to attend a Adtalem event. Laws governing contributions are complex, and in some jurisdictions if the invitee is in the midst of a re-election campaign, the organization's event could be viewed as support for the campaign and the food and drink at the event may be considered gifts. In most instances, there will be limits and reporting obligations that should be carefully followed.

Retaliation

Adtalem prohibits any form of retaliation, including, but not limited to, retaliatory discipline, acts of reprisal, or any form of intimidation for a colleague's reporting or participating in a related investigation of conduct that potentially or actually violates this Code.



ROSS UNIVERSITY SCHOOL OF MEDICINE ANNUAL CAMPUS CRIME STATISTICS - BARBADOS

**Reported in accordance with Uniform Crime Reporting procedures and the
Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act**

	<u>On Campus</u>						<u>Non-Campus Property</u>			<u>Public Property</u>		
Total Crimes Reported for:	2020		2021		2022		2020	2021	2022	2020	2021	2022
	Campus	Dorm	Campus	Dorm	Campus	Dorm						
<u>Criminal Offenses (includes attempts)</u>												
Murder/Non-negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Negligent manslaughter	0	0	0	0	0	0	0	0	0	0	0	0
Sexual Assault-Rape	0	0	1	0	0	8	1	1	0	0	0	0
Sexual Assault-Fondling	0	0	1	0	0	1	0	0	0	0	0	0
Sexual Assault-Incest	0	0	0	0	0	0	0	0	0	0	0	0
Sexual Assault-Statutory rape	0	0	0	0	0	0	0	0	0	0	0	0
Robbery	0	0	0	0	0	0	0	0	0	0	0	0
Aggravated assault	0	0	0	0	0	0	0	0	0	0	0	0
Burglary	0	0	0	0	0	0	1	0	0	0	0	0
Motor vehicle theft	0	0	0	0	0	0	0	0	0	0	0	0
Arson	0	0	0	0	0	0	0	0	0	0	0	0
	<u>On Campus</u>						<u>Non-Campus Property</u>			<u>Public Property</u>		
<u>HATE CRIMES</u>	2020		2021		2022		2020	2021	2022	2020	2021	2022
-	Campus	Dorm	Campus	Dorm	Campus	Dorm						
If there are any hate crimes to report, please enter count here and narrative description below.	0	0	0	0	0	0	0	0	0	0	0	0
	<u>On Campus</u>						<u>Non-Campus Property</u>			<u>Public Property</u>		
<u>VAWA Offenses</u>	2020		2021		2022		2020	2021	2022	2020	2021	2022
-	Campus	Dorm	Campus	Dorm	Campus	Dorm						
Domestic Violence	0	0	0	0	0	0	1	0	0	0	0	0
Dating Violence	0	0	0	0	0	6	0	1	0	0	0	0
Stalking	0	0	1	1	1	0	0	0	1	0	0	0
	<u>On Campus</u>						<u>Non-Campus Property</u>			<u>Public Property</u>		
<u>Arrests</u>	2020		2021		2022		2020	2021	2022	2020	2021	2022
	Campus	Dorm	Campus	Dorm	Campus	Dorm						

Weapons: carrying, possession, etc.	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0
	On Campus						Non-Campus Property			Public Property		
<u>Referral for Disciplinary Actions</u>	2020		2021		2022		2020	2021	2022	2020	2021	2022
-	Campus	Dorm	Campus	Dorm	Campus	Dorm						
Weapons: carrying, possession, etc.	0	0	0	0	0	0	0	0	0	0	0	0
Drug abuse violations	0	0	0	0	0	0	0	0	0	0	0	0
Liquor law violations	0	0	0	0	0	0	0	0	0	0	0	0
<u>Hate Crimes</u>												
Prejudice Categories:												
Race, Religion												
Sexual Orientation												
Gender, Gender Identity												
Disability												
Ethnicity												
National Origin												
On campus or public property:	2020	2021	2022									
<u>Total Unfounded Crimes</u>	0	0	0									

Ross University School of Medicine

Residential Facility	Fire Alarm Monitoring Done Onsite	Partial Sprinkler System¹	Parital Sprinkler System²
Villages at Coverley	No	No	No

¹ Partial Sprinkler System is defined as having sprinklers in the common areas only.

²Full Sprinkler System is defined as having sprinklers in both the common areas and individual units.

[illegible]

- ANNUAL FIRE SAFETY REPORTING

Smoke Detection	Fire Extinguisher Devices	Evacuation Plans/Placards	Number of Evacuation (fire) Drills Each Academic Year
Present	Present	Present	1

al rooms.

[illegible]

[illegible]