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Area:	<i>Compliance</i>
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Applicability:	<i>Des Moines University</i>

Discrimination and Harassment Prohibition

I. POLICY

Des Moines University ("the University") is committed to maintaining a fair and respectful environment for work, study and participation in the life of the University. To that end, the University prohibits any member of the University Community, including but not limited to the Board of Trustees, faculty, administration, staff, students, adjunct faculty and preceptors, volunteers or visitors to campus, whether they be a guest, patron, patient, independent contractor, vendor, service provider or client, from harassing or discriminating against any employee or student of the University because of that person's race, color, national origin, ethnicity, creed, religion, age, disability, sex, gender, gender identity, sexual orientation, pregnancy, veteran status, genetic information and other characteristics protected by law ("protected class"). Incidents of protected class harassment or discrimination will be met with appropriate disciplinary action, up to and including dismissal or termination of employment from the University. The University is committed to preventing or stopping discrimination or harassment whenever it may occur at the University or in its sponsored activities.

This Policy is supplemented by the University's [Title IX Sexual Harassment Policy](#) which is the effective policy only when allegations of sexual misconduct meet the definition of sexual harassment set forth in the regulations implementing Title IX of the Education Amendments of 1972 (Title IX). The University's nondiscrimination statement and contact information for reporting concerns is also available on the [DMU web site, https://www.dmu.edu/legal/](#). Inquiries concerning the application of this policy or Title IX of the Education Amendments of 1972 may be directed to the University's Chief Compliance Officer or to the Office of Civil Rights of the United States Department of Education.

II. PURPOSE

The purpose of this policy is to prohibit protected class discrimination and harassment, to define the reporting and investigation processes for discrimination and harassment claims, and to comply with federal, state and local laws on protected class discrimination and harassment pertaining to prevention, training and prohibition against retaliation.

III. DEFINITIONS

A. Protected Class Discrimination or Harassment

"Protected class discrimination" is defined as any adverse action taken against an individual based on the individual's protected class. Protected class harassment is unwelcome verbal or physical conduct based on

race, color, national origin, ethnicity, creed, religion, age, disability, sex, gender, gender identity, sexual orientation, pregnancy, veteran status, genetic information or any other characteristic protected by law, when:

1. Such conduct has the purpose or effect of unreasonably interfering with the individual's work or academic performance;
2. Such conduct creates or has the intention of creating an intimidating, hostile, or offensive working or learning environment; or
3. Such conduct unreasonably interferes with or limits one's ability to participate in or benefit from an employment or educational program or activity at the University.

B. Sex Discrimination and Sexual Harassment

Sex discrimination is one form of protected class discrimination, and it includes discrimination based on sex, pregnancy, sexual orientation, gender, gender identity, and failure to conform to stereotypical notions of femininity and masculinity. Sexual harassment is a form of sex discrimination. The University's [Title IX Sexual Harassment Policy](#) provides additional guidance on prohibited behavior and procedures for addressing sexual misconduct that meets the definition of sexual harassment until Title IX. The University may elect to address allegations of sexual discrimination that do not fall within the definitions and jurisdiction of the Title IX Sexual Harassment Policy under this policy.

IV. SCOPE

The University endeavors to maintain an institutional environment free from protected class discrimination and harassment. Decisions of the University relating to employment and enrollment are guided by merit and productivity, free from protected class discrimination. Therefore, an individual's membership in a protected class will not be permitted to have an adverse influence upon employment or academic decisions affecting students, employees, applicants for admission, or applicants for employment. Exceptions to this directive may be made in matters involving bona fide occupational qualifications, actions designed to eliminate underrepresentation, or when this Policy conflicts with federal or state laws, rules, regulations or orders.

Every member of the University Community is expected to uphold this Policy as a matter of mutual respect and fundamental fairness in human relations. Every student has a responsibility to conduct himself/herself in accordance with this Policy as a condition of enrollment and every University employee has an obligation to abide by this Policy as a condition of employment.

A. Applicability

This Policy prohibits protected class discrimination and harassment against any University employee or student by any other person in connection with University employment or any educational program or activity of the University, which includes all academic, educational, extracurricular, and other University sponsored programs. Off-campus programs and activities covered by this Policy include, but are not limited to, clinical rotations, on-line educational programs, Global Health activities, community service and other events or activities sponsored by the University.

Visitors, guests, patrons, vendors, service providers, independent contractors or clients who fail to address protected class discrimination and/or harassment of University employees or students by their personnel, of which they know or should have known, may be subjected to sanctions deemed appropriate by the University.

This Policy works in conjunction with other University policies that address employment determinations such

as salary recommendations, promotion and tenure decisions, performance evaluations, hiring decisions, job classification decisions, transfers or reassignments, termination or layoff because of lack of work or elimination of a position, and normal supervisory counseling.

B. Supervisory Relationships

Des Moines University specifically prohibits individuals who are in positions of authority, either in the employment or educational context, from using their position of authority to discriminate or harass others based on their protected class. Furthermore, a supervisor who does not appropriately address reports or incidents of discrimination or harassment, or who does not report incidents about which he or she becomes aware to the appropriate University designee(s) as outlined in Section V of this Policy, will be subject to disciplinary action. Individuals who feel unprepared to address such incidents are strongly encouraged to seek assistance by contacting the Chief Compliance Officer or Human Resources department.

C. Consensual Relationships and Sexual Harassment

When one party stands in a position of authority over another, such as teacher/student or supervisor/subordinate relationships, or has a professional relationship with another such as a doctor/patient relationship, even a consensual romantic or sexual relationship can become unwelcome or may be a breach of professional obligations. Consequently, the University prohibits faculty, staff and students from pursuing or engaging in a romantic or sexual relationship when one of the parties is a supervisor or a teacher of the other, or when there is a professional relationship between the individuals.

In the event of a pre-existing relationship, the employee participant within the relationship is required to immediately disclose the existence of the relationship to the Chief Human Resources Officer and the student must disclose the existence of the relationship to his/her applicable College Dean. Such disclosure will enable University officials to address any potential concerns regarding inappropriate influence over employment or academic decisions by the party in the relationship in the position of authority over the other.

V. REPORTING PROTECTED CLASS DISCRIMINATION AND HARASSMENT

A. Where to Report

The Chief Compliance Officer is the individual designated by the President with responsibility for receiving reports and complaints of protected class discrimination and harassment, for overseeing and ensuring a thorough and impartial investigation process, and for providing education and training about prevention of discrimination and harassment to the University Community in accordance with this Policy. In this capacity, the Chief Compliance Officer also serves as the University's Title IX Coordinator and oversees application of the Title IX Sexual Harassment Policy. The Chief Compliance Officer will determine which policy applies for reported allegations of sexual misconduct.

Contact information for the Chief Compliance Officer:

Erika Linden, CHC
Academic Center, 5th Floor
515-271-1526
Erika.Linden@dmu.edu

All complaints of protected class discrimination and harassment under this Policy should be made to the Chief Compliance Officer at the contact information listed above. This includes complaints concerning administrators, supervisors, employees, staff, faculty, adjunct faculty and preceptors, volunteers, students, patients, vendors, service providers, visitors and other members of the University Community. Those making reports may be asked to provide the complaint in writing.

The Chief Compliance Officer has designated other appropriately trained individuals to receive reports of protected class discrimination and harassment. These individuals will communicate all reports or complaints alleging protected class discrimination or harassment they receive to the Chief Compliance Officer. Designees are:

Marc Wachtfogel, Chief Human Resources Officer
DMU Clinic Building, 1st Floor
515-271-1485
Marc.Wachtfogel@dmu.edu

Alicia Lynch, Director of Student Affairs and Conduct Officer
Admissions Office, Student Education Center, 2nd Floor
515-271-1457
Alicia.Lynch@dmu.edu

If none of these individuals are available, reports may be made to the Vice President of Enrollment Management and Student Affairs.

B. How to Report

Notice of a formal report can be made in person, by phone, in writing, or via email to one of the parties listed above or, for sex/gender-related violations, submitted through the Sexual Misconduct Reporting form on Pulse. Those submitting reports will be asked to provide a clear and concise description of the alleged violations including who was involved and where and when it occurred, any supporting documentation and evidence, and names of any witnesses.

1. **Anonymous Reports.** Individuals may use the University's Compliance Hotline – Lighthouse Services – to report protected class discrimination and harassment anonymously, except that employees who are designated as Reporting Officials in the Title IX Sexual Harassment Policy and who are required to report sexual misconduct may not use this anonymous reporting option to report the sexual misconduct. Those using the hotline should be aware that anonymous reporting will limit the University's ability to meaningfully investigate and address the alleged violations. Reports to the Compliance Hotline can be made using one of the following methods:
 - Toll-free telephone: (877) 472-2110
 - Web: www.lighthouse-services.com/dmu/
 - E-mail: reports@lighthouse-services.com (must include the name DMU in the report)
 - Fax: (215) 689-3885 (must include the name of DMU in the report)

C. Who Should Report

The University encourages any student or employee who believes he or she has been subjected to protected class discrimination or harassment to promptly report the incident so that an appropriate and timely investigation can be undertaken. No one should assume that the University has knowledge of any particular

incident.

1. Responsibility of Students to Report

Any student who believes he or she has been subjected to protected class discrimination or harassment or who observes or is aware of violations of this Policy should report the incident to the Chief Compliance Officer or the Director of Student Affairs and Conduct Officer as outlined in Section V. A. above.

2. Responsibility of DMU Employees

- a. Reports of Sexual Misconduct. Employees who are designated as Reporting Officials in the [Title IX Sexual Harassment Policy](#) are required to report any sexual misconduct they are aware of to the Chief Compliance Officer. Other employees are encouraged to contact the Chief Compliance Officer to report sexual misconduct, unless they are considered Confidential Resources who are exempt from reporting under the policy.
- b. Reports of Other Types of Protected Class Discrimination and Harassment. University employees, other than Confidential Resources as defined in the [Title IX Sexual Harassment Policy](#), who observe, know of, or receive a complaint of protected class discrimination or harassment, are directed to report the information or complaint to the Chief Compliance Officer, Chief Human Resources Officer, or a supervisor in a timely manner. Supervisors receiving such complaints must contact the Chief Compliance Officer or the Chief Human Resources Officer to report the complaint.

Reporting Officials are defined in the Title IX Sexual Harassment Policy and include: DMU's President and CEO; Chief Financial Officer; Chief Compliance Officer and Title IX Coordinator; Chief Development Officer; Chief Diversity Officer; Chief External and Governmental Affairs Officer; Chief Human Resources Officer; Chief Information Officer; Chief Strategic Communications Officer; Dean of College of Health Sciences; Dean of College of Osteopathic Medicine; Dean of College of Podiatric Medicine and Surgery; Vice President - Enrollment Management and Student Affairs; Executive Director - Clinic; Director of Student Affairs; and Campus Services Manager.

Confidential Resources are defined in the [Title IX Sexual Harassment Policy](#) and include professional, licensed counselors and health care providers in the Student Counseling Center and in Student Health.

D. Confidential Reports

Individuals wishing to seek confidential assistance regarding a possible violation of this Policy without making a specific complaint may do so by contacting one of the Confidential Services identified below:

1. For students:

- Student Counseling Center counselors and Student Health providers are Confidential Resources and are designated as on-campus resources from whom individuals may seek confidential assistance.
 - Student Counseling Center – DMU Clinic, 7th Floor, 515-271-1392
 - Student Health – DMU Clinic, 5th Floor, 515-271-7883

2. For employees:

- Employee Assistance Program (EAP): free confidential counseling for University employees is available through the Assistance Center operated by UnityPoint.
 - Assistance Center – 515-263-4004

Concerns reported to these Confidential Services will not be made known to the Chief Compliance Officer,

unless required by law, or if, in the judgment of the individual receiving the report, there is an imminent danger or threat to the safety of the person making the report or to others. Actions taken by the University in response to a confidential inquiry will be as consistent as reasonably possible with the request for confidentiality. See the [Title IX Sexual Harassment Policy](#) for additional guidance on confidential reporting in sexual misconduct situations.

E. External Reports

While DMU will make every effort to address reported discrimination and harassment incidents in a fair and meaningful way, individuals have the right to also file complaints with law enforcement authorities or civil rights agencies, including the Iowa Civil Rights Commission and the Office of Civil Rights of the U.S. Department of Education.

F. Timeline for Reporting

Complaints and reports of protected class discrimination or harassment should be reported as soon as possible after the incident giving rise to the complaint becomes known. Prompt reporting facilitates the University's ability to conduct a thorough investigation. All reports and complaints of protected class discrimination or harassment will be investigated promptly and, depending on the results of the investigation, appropriate remedial action will be taken as expeditiously as possible. Consistent with certain state and federal time lines, the University may decline to investigate reports in which none of the alleged discrimination or harassment occurred within the preceding 300 days, except that there will be no time limit for sexual misconduct reporting.

G. Privacy and Confidentiality Interests

Although the University is committed to respecting the confidentiality and privacy of all parties involved in the reporting and resolution of protected class discrimination and harassment complaints, it cannot guarantee complete confidentiality. For example, state or federal law may require the University to disclose information, disclosure may be necessary for conducting an effective investigation, or confidentiality concerns may be outweighed by the University's interest in protecting the safety and rights of others and its duty to investigate. Information will be shared within the University on a need to know basis only.

The University reserves the right to investigate and resolve a complaint or report of protected class discrimination or harassment regardless of whether the complainant ultimately desires the University to pursue the complaint. Retaliation is expressly prohibited by this Policy, and the University will take steps to prevent retaliation and take strong responsive action if retaliation occurs. Therefore, concerns of retaliation will not serve as a basis for the University not pursuing a complaint. When a report of sexual misconduct meets the definition of sexual harassment under Title IX, the University will comply with Title IX when making a decision to investigate a report contrary to the wishes of the complainant.

VI. RESOLVING DISCRIMINATION OR HARASSMENT COMPLAINTS

A. Responsibilities

1. Chief Compliance Officer. The Chief Compliance Officer will receive reports and generally oversee the investigation and resolution process. This includes identifying and addressing any patterns or systemic

problems that arise during the review of complaints, assigning University Investigators, communicating outcomes, deciding appeals, maintaining records, and training members of the University community on this Policy.

Following receipt of a report or complaint of protected class discrimination or harassment, the Chief Compliance Officer or his/her designee will:

- a. Conduct a preliminary review of the complaint to determine whether it should proceed through the process outlined in this Policy, the [Title IX Sexual Harassment Policy](#), or another University dispute resolution procedure and, as appropriate, refer the complainant to that process as soon as possible.
 - b. Inform the complainant of the protected class discrimination or harassment complaint procedures. Provide information about available support resources.
 - c. Inform the respondent (the individual against whom the formal complaint is brought) of the complaint and of the protected class discrimination and harassment complaint procedures. Provide information about available support resources.
 - d. Inform the complainant and respondent that they are allowed to have one advocate of their choosing with them throughout the investigation and remediation process to advise them. Advocates may support the complainant or respondent but are not allowed to speak for them or directly participate or interfere in the investigation and remediation process.
 - e. Inform the complainant and respondent there can be no retaliation for reporting a possible violation of this Policy or for assisting in an investigation of a possible violation. Any allegations of retaliation should be reported immediately to the Chief Compliance Officer.
 - f. Assign University Investigators to conduct the investigation. Other appropriately trained individuals may be assigned to assist in investigations. The Chief Compliance Officer may serve as an investigator for some cases.
 - g. Communicate regularly with the assigned University Investigators to monitor progress of investigation.
 - h. If, at any point in the inquiry or investigation, the Chief Compliance Officer determines that there is no reasonable cause to believe that policy has been violated, the process will end unless the complainant requests that the Chief Compliance Officer makes a determination to re-open the investigation. This decision lies in the sole discretion of the Chief Compliance Officer based on additional information provided by the complainant.
 - i. Follow-up to confirm the effectiveness of any remedy in stopping the alleged discrimination or harassment, preventing its recurrence and addressing its effects on the complainant and the community.
 - j. Maintain appropriate documentation and recordkeeping.
2. University Investigators. The Chief Compliance Officer has delegated responsibility to appropriately trained investigators to conduct investigations and, in consultation with the applicable College Dean or other appropriate management personnel, issue appropriate sanctions for founded violations of this Policy. University Investigators will:
- a. Interview and obtain detailed information and evidence from the complainant, respondent, and any witnesses.
 - b. Communicate regularly with the Chief Compliance Officer regarding the progress of the investigation.

- c. Reasonably keep other appropriate personnel (e.g., supervisor of complainant or respondent) informed of progress of investigation, as necessary.
- d. Provide Interim Remedies during the investigation and recommend remedial actions based on findings of investigation.
- e. If deemed necessary to protect the safety of complainants, other individuals or campus property, impose Interim Actions (see below) in consultation with the applicable College Dean or other management personnel.
- f. For substantiated violations, impose sanctions, in consultation with applicable College Dean or other management personnel.
- g. Maintain appropriate documentation and prepare reports of all interviews, evidence, and conclusions and submit to Chief Compliance Officer.

3. Special Circumstances

- a. In the event the investigation involves the President of the University or the Chief Compliance Officer, it shall be the responsibility of the Board of Trustees to designate the appropriate individual(s) to oversee the investigation.
- b. Any actual or perceived conflict of interest between the Chief Compliance Officer or University Investigators and parties involved in the case will be disclosed and responsibilities will be reassigned to other trained personnel if necessary to assure a fair process.

B. Optional Initial Step for Complainant

If a complainant feels comfortable and safe doing so, he or she is encouraged, but not required, to clearly explain to the alleged offender that the behavior is objectionable and request that it cease. If the complainant feels uncomfortable or unsafe confronting the alleged offender, or if he or she does so and the behavior does not stop, or if the complainant believes some adverse employment or educational consequences may result from the discussion, he or she should contact the Chief Compliance Officer to initiate the University investigation process.

C. Investigation Procedures and Remediation

The University will follow these procedures to investigate and determine the facts of a particular situation, to facilitate remedies for the complaints involving allegations of protected class discrimination or harassment, and to remediate inappropriate behavior in an effort to prevent any recurrence. The University will make reasonable efforts to protect the rights of both the complainant and the respondent. These procedures do not replace the right of a complainant to pursue other options or remedies available under the law. At all times the complainant has the right to file a criminal complaint with law enforcement or a civil rights agency. If requested, the University will assist the complainant in contacting law enforcement.

As part of the complaint process, and if deemed appropriate under the circumstances, the Chief Compliance Officer may recommend that the complainant and respondent attempt to resolve the matter through informal methods including facilitated conversation or mediation, intervention by a supervisor, or one-on-one meetings. Resolution through these informal means may include an agreement to terminate and not repeat specific conduct, an apology and/or participation in education, training or counseling, or the withdrawal of the allegation. For purposes of annual reporting, a written record of the complaint and of the informal resolution process undertaken will be made. Finalization of the informal resolution will include a written document approved by the Chief Compliance Officer and signed by the complainant and respondent. At any time during

an informal resolution process, either party may elect to suspend the informal process and switch to the formal process.

If the informal process described above does not resolve the complaint to the satisfaction of the complainant, if the complainant requests a formal investigation, or if the Chief Compliance Officer determines a formal investigation is appropriate, the matter will be resolved consistent with the following guidelines. The case will be assigned to University Investigators. The parties will be notified of the complaint and advised that no retaliation of any kind will be tolerated.

Each investigation will be different based on the facts, circumstances and witnesses. Generally, an investigation will include interviews with the complainant, the respondent and others who might have information that would be helpful to a determination of the matter.

Throughout the process, the complainant and respondent will have an equal opportunity to receive available information and advice and to present evidence and witnesses. Both parties will receive periodic status updates. A preponderance of the evidence standard shall be used in making determinations of responsibility. Following the investigation, the University Investigator will submit a written report to the Chief Compliance Officer.

1. Interim Remedies and Interim Actions

- a. University Investigators may provide Interim Remedies intended to address the short-term effects of harassment, discrimination and/or retaliation, i.e., to redress harm to the complainant and the community and to prevent further violations. These remedies may include, but are not limited to: referral to counseling and health services; referral to the Employee Assistance Program; education to the community; altering work arrangements for employees; providing campus escorts; or offering adjustments to class or rotation assignments.
- b. University Investigators may issue no contact directives to the respondent, complainant or both for the duration of the investigation. These no contact directives may extend beyond investigation closure and resolution.
- c. In consultation with the applicable College Dean or other appropriate management personnel, University Investigators may impose Interim Actions on the respondent prior to the completion of the investigation and resolution of a complaint. Examples of these Interim Actions may include, but are not limited to, interim suspension, administrative leave or leave of absence (which may be without pay for employees), changes in schedules or loss of specific University privileges.
- d. Generally, an Interim Action separating the respondent from the University will be imposed only when, in the judgment of the University Investigators and the applicable College Dean or other appropriate management personnel, the respondent's presence on campus would constitute a threat to the safety and well-being of members of the campus community. In all cases in which an interim suspension is imposed, the student or employee will be given the option to meet with the Chief Compliance Officer prior to such suspension being imposed, or as soon thereafter as reasonably possible, to show cause why the suspension should not be implemented. The Chief Compliance Officer has sole discretion to implement or stay an interim suspension and to determine its conditions and duration. Violation of an interim suspension under this policy will be grounds for expulsion or termination.
- e. During an interim suspension or administrative leave, a student or employee may be denied access to University campus facilities or events. This restriction can include classes and/or all other University activities or privileges for which the respondent might otherwise be eligible. During the

Interim Action, the respondent must receive written permission from the Chief Compliance Officer to participate, attend or fulfill educational and/or employment responsibilities.

- f. The institution will maintain as confidential any Interim Remedies and Interim Actions, provided confidentiality does not impair the institution's ability to provide the Interim Remedies and Interim Actions.

2. Determinations

- a. The outcome of the investigation may be a finding that the allegations could not be substantiated or a finding that the allegations are substantiated, in full or in part. The standard of proof for a substantiated finding is that of a "preponderance of the evidence" – that is, evidence which, taken as a whole, shows that it is more likely than not that a violation of the policy occurred. All determinations by University Investigators will be reported to and reviewed by the Chief Compliance Officer before being communicated to the complainant and respondent.
- b. If a violation of this Policy is substantiated, the University Investigators will issue a sanction in accordance with the procedures outlined in this Policy or applicable employment-related or student-related policies, in consultation with the applicable College Dean or other management/supervisory personnel. The level of discipline will depend on the severity of the misconduct and may include, but is not limited to, verbal or written warnings, loss of privileges, no contact directive, remedial training, restitution, probation, suspension, termination of employment, or dismissal from the University.

NOTE: All sanctions related to faculty and staff when they are found to be in violation of this Policy will be made by the Chief Human Resources Officer in consultation with the appropriate administrative supervisor of the respondent, following applicable employment-related policies.

- c. The University will conduct a fair, impartial investigation in a timely manner. The amount of time needed to conclude an investigation will depend on the nature of the allegation(s) and the scope of the investigation (e.g., the number and/or availability of witnesses involved).
- d. Once a determination is made, the Chief Compliance Officer will provide written notice of the investigation outcome to the complainant and respondent concurrently. Typically, such notice will occur within five (5) business days following the determination.
- e. The University will consider the results of the investigation and act promptly and effectively to remedy the effects of the misconduct upon the complainant and the University community. The Chief Compliance Officer will follow up as appropriate to ensure that the remedial action is effective. Complainants are encouraged to report any recurrences of conduct that were found to violate this Policy.

3. Appeals

Generally, determinations are final and there are no grounds for appeal, however, employees covered under a union contract may have rights to appeal a determination and disciplinary action through the applicable grievance procedure.

VII. PROHIBITION AGAINST RETALIATION

It is a violation of this Policy for anyone to retaliate, intimidate, threaten, coerce, or otherwise discriminate against any individual for exercising his/her rights and responsibilities under the Policy. Retaliation in any form, including use of social media or by third parties, is prohibited. The ban on retaliation will remain in effect even if it is determined that no policy violation occurred.

Anyone who, in good faith, reports what she or he believes to be protected class discrimination or harassment, or who participates or cooperates in any investigation, will not be subjected to retaliation. Anyone who believes he or she has been the subject of retaliation for reporting protected class discrimination or harassment or participating or cooperating in an investigation should immediately contact the Chief Compliance Officer.

Any person found to have retaliated against a person who has participated or cooperated in an investigation will be in violation of this Policy and will be subject to disciplinary action. The level of discipline will depend on the severity of the retaliation and may include, but is not limited to, verbal or written warning, loss of privileges, no contact directive, restitution, probation, suspension, termination of employment, or dismissal from the University.

VIII. DELIBERATELY FALSE REPORTS

To make deliberate false or malicious accusations of protected class discrimination or harassment violates this Policy. In such instances, the complainant will be subject to disciplinary action. However, failure to prove a claim of discrimination or harassment alone does not constitute proof of a false and/or malicious accusation.

IX. PREVENTION & TRAINING

Des Moines University has developed, adopted and published this Policy with the intent of eliminating and preventing protected class discrimination and harassment. The procedures contained herein have been developed and adopted to address violations of protected class discrimination or harassment that might occur notwithstanding University policy.

In our efforts to be proactive in preventing violations of this Policy, the University will disseminate this Policy to employees and students and will provide training on a regular basis pertaining to the prevention of discrimination or harassment. Employees will be required to complete a training module at hire and every three years thereafter. Students will be informed of this Policy and educated on reporting procedures annually through campus-wide orientations and communications. Those individuals and/or entities not directly employed by Des Moines University, but with affiliation and/or contractual agreements with the University are expected to abide by this Policy.

Any questions related to this Policy should be directed to the Chief Compliance Officer.

Approved By:

Angela Franklin, Ph.D., President

General Disclaimer

The information available in PolicyStat is not to be treated or implied as a contract but rather as a unilateral statement of University policies. The University reserves the right to revoke, modify or suspend any of its policies or procedures at any time without notice.

Attachments

No Attachments

Approval Signatures

Approver	Date
Angela Franklin	08/2020
Erika Linden	08/2020

Applicability

Des Moines University

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