**INTRODUCTION**

Ross Education values civility, dignity, diversity, education, honesty, and safety and is firmly committed to maintaining a campus environment free from all forms of violence.

The Ross Education Anti-Hazing Policy (this “Policy”) prohibits hazing as defined in Section II below. Hazing as defined within this policy is a violation of both federal law and, as detailed in Section V below, applicable state law in all states in which Ross Education facilities are located.

It is the policy of Ross Education to at all times comply with the Stop Campus Hazing Act (the “SCHA”) and the Jeanne Clery Campus Safety Act 20 U.S.C. § 1092(f), and its implementing regulations at 34 C.F.R. § 668.46 (collectively, the “Clery Act”). The Clery Act is a federal law requiring Title IV federally subsidized institutions of higher education to disclose certain crime, fire, and safety information in publicly available documents. As amended by the SCHA, the Clery Act includes provisions pertaining to hazing, and includes hazing in the required Clery Act disclosures for all applicable institutions.

Nothing in this Policy is intended to or will be implemented in a manner which unlawfully prohibits constitutionally protected speech and expression.

**I. SCOPE**

This Policy applies to all current Ross Education students, faculty, and staff.

Ross Education, as a matter of policy, does not recognize any official Student Organizations at any campus, and does not permit the formation or establishment thereof. To the extent any informal, unofficial, or otherwise unrecognized Student Organizations exist, this Policy further applies to such groups.

This Policy covers acts of hazing, as defined below, when such acts occur on campus or other property owned or controlled by Ross Education, or in the context of a Ross Education program or activity occurring off-campus.

This Policy is not intended to limit the application or enforcement of other Ross Education policies. Conduct that may violate this Policy may also be subject to investigation under other Ross Education policies and procedures. Such investigations may proceed concurrently, and individuals may be held accountable under multiple policies simultaneously. Ross Education reserves the right to pursue separate investigations as necessary, and the existence of this Policy does not preclude or restrict any investigation or action under other applicable policies.

**II. DEFINITIONS**

“**Hazing**” is defined as any intentional, knowing, or reckless act committed by a person (whether individually or in concert with other persons) against another person or persons regardless of the willingness of such other person or persons to participate, that:

**a)** is committed in the course of initiation/admission into or maintenance of membership in a Student Organization; and

**b)** violates local, federal, or state criminal law or causes or creates a reasonable risk of physical or psychological injury which exceeds the reasonable risk encountered in the course of participation in Ross Education activities.

Examples of Hazing consistent with federal and state law include, without limitation:

* whipping, beating, striking, branding, electronic shocking, placing of a harmful substance on someone’s body, or similar activities;
* causing, coercing, or otherwise inducing sleep deprivation, exposure to the elements, confinement in a small space, extreme calisthenics, or other similar activity;
* causing, coercing, or otherwise inducing another person to consume food, liquid, alcohol, drugs, or other substances;
* causing, coercing, or otherwise inducing another person to perform sexual acts;
* any activity that places another person in reasonable fear of bodily harm through the use of threatening words or conduct; and
* any activity that induces, causes, or requires another person to perform a duty or task that involves a criminal violation of local, state, tribal, or federal law.

Claims that the conduct or activity in question was not part of an official student organizational event or was not officially sanctioned or approved by the student organization does not constitute a defense to a charge of Hazing. Hazing is prohibited regardless of its formal association with any student organization’s scheduled or recognized activities.

It is generally not a defense to Hazing under this section that the individual against whom Hazing was directed consented to or acquiesced in the Hazing, though the final determination is subject to the facts and circumstances of each situation.

For purposes of this Policy, “**Student Organization**”, as defined in the SCHA, means an organization, including but not limited to a club, society, association, athletic team, club sports team, social, professional, or pre-professional fraternity, sorority, band, or student government in which two or more of the members are students enrolled in a Ross Education academic program. As stated above, no such organizations are established or recognized by Ross Education, and this Policy applies to any such organizations meeting this definition irrespective of their unofficial status.

**III. REPORTING AND INVESTIGATION**

Any Ross Education student, faculty member, or staff member who has witnessed, experienced, or been made aware of conduct constituting Hazing under this Policy is encouraged to promptly report the conduct to the campus Associate Director or any other individual designated as a Campus Security Officer.

Ross Education will extend amnesty to encourage reporting of violations of this Policy, in that any individuals reporting Hazing will not be held responsible for violating this Policy if they have been subjected to Hazing as part of the activity or event that they are reporting, regardless of whether they voluntarily participated in such Hazing. This amnesty policy may not apply in cases of more serious allegations of physical abuse or distribution of alcohol or illicit drugs in violation of other Ross Education policies.

Being in the presence of Hazing without reporting it could potentially be considered a violation of this Policy. For Ross Education employees, such failure to report may be considered a serious conduct violation and lead to disciplinary measures up to and including termination.

Individuals also have the right to pursue any criminal remedies for Hazing that may be available under applicable federal, state, or local law. Any individual who experiences, witnesses, or learns of possible criminal conduct should contact law enforcement by calling 911 for emergencies.

No individual may intimidate, threaten, coerce, or discriminate against any individual for the purpose of interfering with any right or privilege secured by this Policy, or because an individual has made a report or formal complaint, testified, assisted, or participated or refused to participate in any manner in an investigation or other proceeding under this Policy. Retaliation against any individual as described herein will be considered a violation of this Policy.

Upon receipt of a report of Hazing, the campus Associate Director and/or Campus Security Officer is required to promptly share any such details with the Ross Education Clery Act Compliance Official. The Clery Act Compliance Official will then:

* Assess the nature and circumstances of the report to determine appropriate follow-up, including whether or not further investigation is appropriate; and
* Notify applicable law enforcement of any conduct which, as alleged, would constitute a crime.

Any investigation into a reported violation of this Policy will be carried out in accordance with ordinary Ross Education disciplinary procedures. Any students, faculty members, or staff suspected of violating this Policy will be informed of the alleged violation and afforded the opportunity to be heard prior to the implementation of any disciplinary measures.

Individuals found to be in violation of this Policy may be subject to disciplinary action including, but not limited to, suspension, expulsion, or termination of their employment or other affiliation with Ross Education. Further disciplinary measures will be extended, as applicable, to any unofficial Student Organization involved in a violation of this Policy. Such measures may include, without limitation:

* If practicable, the unofficial Student Organization will be required to dissolve, and to provide Ross Education officials with available information regarding its membership to address any further necessary individual disciplinary action; or
* If dissolution is not within the ability of Ross Education to enforce, continued membership or affiliation in such unofficial Student Organization will be prohibited for any active Ross Education students, faculty members, or staff, with any such continued affiliation to be treated as a violation of this Policy.

**IV. PREVENTION AND AWARENESS**

Ross Education will offer and make available research-informed, campus-wide prevention programming designed to reach students, faculty members, and staff, which may include, as applicable:

* Information regarding this Policy and its application, including reporting and investigation of allegations of Hazing;
* Primary prevention strategies intended to stop Hazing before it occurs, including, but not limited to, bystander intervention, information about ethical leadership, and promotion of strategies for building group cohesion without Hazing; and
* Information about applicable state, local, or tribal anti-hazing laws.

In addition, applicable regular training for Campus Security Officers and campus Associate Directors will include requirements for reporting Hazing and violations of this Policy, and procedure for the investigation of any such allegations.

As required by the SCHA and Clery Act, Ross Education will publicly report, in summary form, findings concerning any unofficial Student Organization found to be in violation of this Policy. Reports of Hazing and statistics pertaining to violations of this Policy shall also be published in the Annual Security Report.

**V. APPLICABLE STATE LAW**

State laws addressing and prohibiting Hazing exist in all states in which Ross Education campuses are present. The applicable provisions of each state’s laws may be found as follows:

***Michigan Anti-Hazing Law (“Garret’s Law”):*** Michigan Comp. Laws § 750.411(t)

***Ohio Anti-Hazing Law (“Collin’s Law”):*** Ohio Rev. Code § 2903.31

***Indiana Anti-Hazing Law:*** Indiana Code § 25-42-2-2.5

***Kentucky Anti-Hazing Law (“Lofton’s Law”):*** Kentucky Rev. Statutes § 508.180-186

***Tennessee Anti-Hazing Law:*** Tennessee Code § 49-7-123

***West Virginia Anti-Hazing Law:*** West Virginia Code § 18.16.2-4

***Alabama Anti-Hazing Law:*** Alabama Code § 16-1-23

***Iowa Anti-Hazing Law:*** Iowa Code § 35-42-2-2.5