ACG Equality, Diversity and Inclusion Policy

<table>
<thead>
<tr>
<th>Version</th>
<th>Authorised by</th>
<th>Owner</th>
<th>Date Reviewed</th>
<th>Next Review</th>
</tr>
</thead>
<tbody>
<tr>
<td>January 2020</td>
<td>Vice President of Administration</td>
<td>Vice President of Administration</td>
<td>January 22, 2020</td>
<td>December 2020</td>
</tr>
<tr>
<td></td>
<td>Dean of Students</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

1. Equality, Diversity and Inclusion Statement

Greek Law¹ and this Policy protect ACG Community members, in particular students, from discrimination, harassment, bullying and victimisation, and provide safeguards for the equitable treatment of persons with disabilities in a manner that appropriately ensures reasonable accommodations towards addressing the multiple disadvantages that they experience and enabling them to participate fully in College life.

The following characteristics are protected:

- sex
- disability
- gender and/or gender identity, reassignment or expression
- sexual orientation
- age
- race
- ethnicity
- color and membership of a minority
- nationality or national origin
- creed
- religion, belief or non-belief
- social origin, birth and property
- language
- political or other opinion
- pregnancy and maternity
- genetic information
- marital status
- citizenship status

• veteran or military status

or any other characteristic which constitutes a legally prohibited basis for discrimination and is, thus, unlawful.

ACG respects diversity and is committed to inclusion. This Policy aims to guarantee that each community member is treated fairly and with respect within an educational environment free of discrimination, sexual misconduct, harassment, including sexual or gender-based harassment, sexual assault, sexual exploitation and relationship/dating violence, bullying, stalking, victimization, intimidation and retaliation against whistleblowers (see ACG Whistleblower Policy) who, in good faith, report prohibited conduct under the Policy. All prohibited conduct under the Policy is also proscribed by law and will not be tolerated.

ACG is committed to creating a responsive educational setting, where cultural diversity, inclusion and equal treatment, the dignity of and respect for all are protected. The value of diversity and promotion of equality and inclusion permeate all aspects of ACG’s academic, learning, pastoral support, facilities, services and the student engagement environment. ACG is dedicated to adding distinctive and sustainable value to the lives of students and to maintaining a campus ethos of mutual respect, care and responsible action. Equality and non-discrimination are embedded in the College’s campus ethos of mutual respect and equal opportunity employer standards reflected in ACG policy.

ACG is actively documenting the demographic characteristics of students, faculty and staff. On occasion of the annual review of this Policy, documentation of demographic characteristics and revision of which protected characteristics should be documented shall be updated and performed respectively.

Latest (Fall 2019) demographic characteristics of pertinence to the scope of the ACG Equality, Diversity and Inclusion Policy are provided:

<table>
<thead>
<tr>
<th>Fall 2019 (Undergraduate)</th>
<th>Students</th>
<th>Faculty</th>
<th>Staff</th>
</tr>
</thead>
<tbody>
<tr>
<td>Headcount</td>
<td>3,439</td>
<td>260</td>
<td>220</td>
</tr>
<tr>
<td>Greek</td>
<td>2,866</td>
<td>212</td>
<td>191</td>
</tr>
<tr>
<td>International</td>
<td>573</td>
<td>48</td>
<td>29</td>
</tr>
<tr>
<td># of countries and regions</td>
<td>61</td>
<td>13</td>
<td>10</td>
</tr>
<tr>
<td>Male</td>
<td>1,623 (47.2%)</td>
<td>110 (42.3%)</td>
<td>78 (35.5%)</td>
</tr>
<tr>
<td>Female</td>
<td>1,816 (52.8%)</td>
<td>150 (57.7%)</td>
<td>142 (64.5%)</td>
</tr>
</tbody>
</table>
ACG strives to protect students and the ACG Community against unlawful treatment based on protected characteristics and to ensure that all ACG Community members are aware of their rights and responsibilities in relation to Equality, Diversity and Inclusion.

ACG is committed to incorporating standards set by Greek and E.U. law and policy and U.S. federal laws, and complements relevant ACG Policies, Protocols and Codes of Conduct, where applicable, thereby intra-coordinating College by-laws to ensure efficient response.

ACG is committed to training and development of students and staff in relation to equality and diversity: indicative examples include the 2018-19 Cultural Diversity Trainings addressed to all faculty and staff, the College-wide Diversity and Inclusion campaign in Spring 2019, the 2019-20 Non-Discrimination policy trainings for faculty and staff (ongoing), and a series of Meaningful Engagement programs and trips led by Student Affairs and addressing students focused on equality and diversity topics and employing experiential learning methods.

ACG is committed to Equality and Diversity policy monitoring and employs to those ends the Equality Impact Assessment form and equality analysis methods to evaluate whether a policy, procedure or practice is likely to have a discriminatory impact on persons on the basis of any of the aforementioned protected characteristics. Equality analysis is employed to assess a new policy, revise and remove existing policies, decision-making and organizational change. In performing equality analyses, led by the Vice President of Administration and the Dean of Students and supported by key faculty, administrators and staff, the College strives to secure appropriate and sufficient evidence and documentation, internal and external information, targeted consultation. The identification of what may adversely affect protected groups, justification of decisions regarding policy, and proposed action, as well as monitoring and review are grounded in the outcomes of the equality analysis and reflected in the Equality Impact Assessment form.

This policy shall be enforced alongside the ACG Non-Discrimination, Anti-Harassment, Sexual Misconduct, Relationship Violence and Stalking Policy, providing procedures and sanctions for dealing with discrimination, bullying, harassment and victimization.

2. Purpose

The purpose of the ACG Equality Diversity and Inclusion Policy is to:

Raise awareness about equality, diversity and inclusion within the student body and the broader ACG Community and encourage the adoption of associated principles.
Provide an environment which encourages students to disclose concerns regarding violations of this policy to academic or support staff, as prescribed by the ACG Non-Discrimination, Anti-Harassment, Sexual Misconduct, Relationship Violence and Stalking Policy (2019).

Foster and promote consistent and unbiased treatment towards students, staff and all members of the ACG community.

Adhere to Greek and European Laws and legal requirements for protected characteristics ensuring fair treatment to all.

Create a safe, friendly, evolving learning environment and fortify the community of care within ACG, so as to protect the values, aspirations and diversity of all students.

3. Scope

This Equality, Diversity and Inclusion Policy applies to all aspects of student life and the entire cycle of student recruitment, admissions, academic learning, student support, learning support, facilities, IT, and associated communication. This Policy applies to students, prospective students, associated visitors and guests. The values enshrined in this Policy also apply to faculty and staff as members of the ACG Community (see ACG Non-Discrimination, Anti-Harassment, Sexual Misconduct, Relationship Violence and Stalking Policy).

This Policy applies to ACG premises and off-campus locations of scheduled College programs and activities; and the virtual space within which electronic communications involving persons to whom the Policy applies take place.

ACG will encourage all external partners and stakeholders to adhere to this Policy.

4. ACG’s expectations

4.1 Students and ACG Community members should not discriminate in the course of undertaking studies, activities, or in undertaking duties, nor should they attempt to encourage peers, or others to do so.

4.2 Students and ACG Community members should not harass, intimidate, victimise or isolate anyone on account of their protected characteristics, nor should they engage in sexual harassment and gender-based harassment, both forms of discriminatory harassment, sexual assault, sexual exploitation, relationship/dating violence, stalking and cyber-stalking and retaliation (see ACG Non-Discrimination, Anti-Harassment, Sexual Misconduct, Relationship Violence and Stalking Policy).

4.3 Students and ACG Community members shall not post disrespectful, offensive images of peers, faculty or staff on Social Media, nor display or divulge personal information about peers via Social Media or other electronic methods or devices without prior consent.

4.4 Students should inform a person in a position of responsibility, a Responsible Employee (under 5. Procedure, below) or the Dean of Students (see ACG Non-
Discrimination, Anti-Harassment, Sexual Misconduct, Relationship Violence and Stalking Policy) if they suspect that discrimination is taking place.

Students studying at ACG are expected to adhere to the above expectations at all times.

5. Procedure

Any member of the ACG Community or third party to whom the Policy applies may request information, advice and assistance in reporting an incident, accessing professional care, or filing a formal complaint.

If a student believes they have been harassed, discriminated against, bullied or victimised due to one of the protected characteristics then they should notify ACG about the incident as soon as possible. Students may report incidents involving prohibited conduct under this Policy to the Dean of Students.

For urgent concerns, the Aghia Paraskevi Campus Main Gate (+302106009800 ext. 1100), and the Downtown Campus Front Desk (+302108964531) are staffed 24/7 and will provide immediate response and referrals to on and off campus resources.

College Nurses can be reached during ACG Health & Wellness Center operating hours (+30600980 ext. 1500, 1093, 1193).

Regarding off-campus resources: 24-hour Victims of Violence hotline (197) provides assistance to victims of sexual assault and rape.

Students are encouraged to speak with an ACG employee whom they are comfortable disclosing to, who will then put them in touch with a member of Student Affairs, or directly with a member of the Student Affairs team.

Responsible employees, who are required to report incidents, incl. personally identifying details, of discrimination and all prohibited conduct under the Policy involving ACG students or any other community member or third party without delay, include:

(a) ALL faculty
(b) ALL administrators/staff in supervisory position, including supervisors of student employees (student assistants and on campus interns)
(c) ALL administrators/staff who have specific responsibility for the wellbeing of students or employees, such as campus security and senior staff members in Student Affairs and ACG Health & Wellness Center, Educational Counseling Services, Residence Life, International Student Services, and Athletics
(d) Instructors, teaching assistants, coaches, advisors, program counselors, such as the Study Abroad Program, who teach, advise, coach or mentor students

Students can disclose in confidence to Responsible Employees. Students must understand the reporting obligation of Responsible Employees to the Dean of Students before they reveal any information.
Students who have disclosed a concern will be invited to attend a meeting with Student Affairs or, directly, the Dean of Students in order to discuss and clarify their concerns. Students will be guided through the reporting options: informal hearing, where that is allowed by what law prescribes and determined by the gravity of the violation reported; formal complaint/report; and anonymous report. Accordingly, a written record will be made and stored in a confidential folder which is held electronically by the Student Affairs team.

Information disclosed during this meeting will not be shared with a third party, without prior student consent, except in the event that the matter is detrimental to the health, safety and/or general wellbeing of the student or other. This is in accordance with ACG policies on emergency response, first-aid and health and wellness, and specifically with what is prescribed by the ACG Non-Discrimination, Anti-Harassment, Sexual Misconduct, Relationship Violence and Stalking Policy.

Investigation of reported conduct or concerns can be informal or formal, depending on the nature and severity of the alleged misconduct. The investigation will be led by the Dean of Students, or the Vice President of Administration in the case that ACG employees are involved in the reported incident. The student will be notified within 5 weeks from the formal/informal report about the outcome of the investigation. During this period, ACG will offer the student and any ACG Community member involved in the procedure ongoing support, which may involve interim measures. The College’s disciplinary procedure applies in the case that reported incidents raise concerns about the violation of the Student Conduct Code, the ACG Non-Discrimination, Anti-Harassment, Sexual Misconduct, Relationship Violence and Stalking Policy, or any other College policy referred to therein.

ACG is committed to an immediate and timely response to reported incidents and to the efficient activation of the procedure for addressing such concerns.

6. Responsibilities

It is the responsibility of all students at ACG to adhere to and implement the principles of the Equality, Diversity and Inclusion Policy. Violations of this Policy will be addressed by Responsible Employees and ACG promptly, sensitively and confidentially, with a view to resolving the issue. The Dean of Students has delegated responsibility for the implementation and promotion of this Policy, and for systematically and annually reviewing it after consultation with the Office of the VP of Administration, Student Affairs, Academic Affairs, International Student Services, the ACG Health & Wellness Center, the ACG Counseling Center, the Sexual Assault Response Team, Campus Security, and following deliberation with the Student Government. The VP of Administration and the Dean of Students hold responsibility for ensuring that the Equality, Diversity and Inclusion Policy for Students is robust and fit for purpose.

ACG Community members are encouraged to address feedback and concerns about this policy to the Dean of Students (incident@acg.edu) and the Office of the VP of Administration (hr@acg.edu).
7. Monitoring and Review

This policy will be reviewed annually to ensure that it continually meets the diverse needs and expectations of students and the institution as a whole. Annual review meetings are initiated by the Dean of Students. In monitoring and reviewing this Policy, the Dean of Students takes into account input afforded by the Sexual Assault Response Team, which also meets annually to develop and revise operating guidelines and review how cases/concerns were addressed by the College in the preceding academic year.

8. External Reporting

ACG reports data of pertinence to the protective scope of the ACG Equality, Diversity and Inclusion Policy to the United States Federal Department of Education (annually), and periodically to NECHE (New England Commission of Higher Education, previously NEASC) and the Open University (Annual Monitoring Report).

9. Other related documents

- ACG Non-Discrimination, Anti-Harassment, Sexual Misconduct, Relationship Violence and Stalking Policy
- ACG Whistleblower Policy
- ACG First Aid Protocols
- ACG Security Emergency Procedures Protocol
- Health & Safety Policy
- Deree Student Code of Conduct