

THE AMERICAN COLLEGE OF GREECE

ACG Equality, Diversity and Inclusion Policy & Non-Discrimination, Harassment and Sexual Misconduct Policy

Responsible Office(s)	Office of the Senior Vice President of Administration and Pierce, Office of the Dean of Students
Approver	Senior Vice President of Administration and Pierce
Author	Office of College Legal Affairs and Policy
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Date of Next Review	January 2027
Review Interval (1 - 2 years)	2 years
Equality Impact Assessments/Equality Analyses	

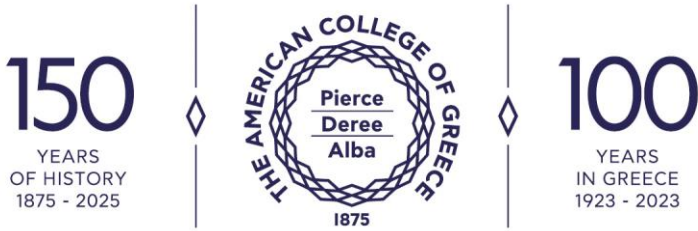
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File Location	Blackboard (Organizations -> ACG Policies and Procedures ->ACG Policies -> ACG-WIDE POLICIES -> Non-Discrimination, Harassment and Sexual Misconduct Policies -> ACG Equality, Diversity and Inclusion Policy & Non-Discrimination and Sexual Harassment Policy)
Relevant Policies	ACG Child Protection Policy, ACG First Aid Protocols, ACG Security and Emergency Procedure Protocol, ACG Whistleblower Policy, Deree Student Code of Conduct

ACG is dedicated to creating a community that values equity, diversity, and inclusion, where all individuals are treated with respect, dignity, and fairness. Discrimination, harassment, and sexual misconduct are fundamentally at odds with these principles and are strictly prohibited.

This Policy serves to uphold our commitment to a safe and supportive environment by clearly defining unacceptable behaviors, outlining processes for addressing violations, and fostering accountability. By adhering to this Policy, we strive to ensure that every member of our community can contribute and thrive free from prejudice, intimidation, or harm.

Chapter A focuses on Equality, Diversity, and Inclusion, defining the protected characteristics that legally prohibit discrimination and are considered unlawful. It also outlines institutional expectations and procedures



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for addressing incidents, as well as a reviewing and monitoring Policy implementation.

Chapter B includes the Non-Discrimination, Harassment and Sexual Misconduct Policy, detailing institutional commitment to preventing and responding to discrimination and harassment and sexual misconduct. It outlines prohibited behaviors, the rights and responsibilities of ACG community members, and the procedures for reporting and addressing incidents.

This Policy is available in alternative formats to ensure accessibility for all members of the ACG community, including those with disabilities or specific needs. If you require this document in an alternative format, such as large print, Braille, or an accessible electronic version, please contact the Responsible Offices (see above).

We are committed to providing accessible materials and ensuring that everyone has the support they need to engage with this Policy effectively.

Chapter A

ACG Equality, Diversity and Inclusion Policy

Contents

ACG Equality, Diversity and Inclusion Policy 4

1. Introduction 5

2. Purpose 9

3. Scope..... 10

4. Definitions 11

4.1. Equality 11

4.2. Diversity 11

4.3. Inclusion 12

4.4. Harassment 12

4.4.1. Sexual or gender-based harassment 13

4.5. Bullying 14

4.6. Victimization..... 15

5. College’s expectations..... 15

6. Procedure 16

7. Training and Support for Employees and Students 19

(ACG 150 Years Celebration Logo)

8. Responsibilities.....	20
9. Record keeping.....	21
10. Monitoring and Review	21
11. External Reporting.....	22
12. Other related documents	22

1. Introduction

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

The following characteristics are protected:

- age;
- sex;
- gender and/or gender identity, reassignment or expression, including non-binary;
- sexual orientation;
- race;
- nationality; or national origin;

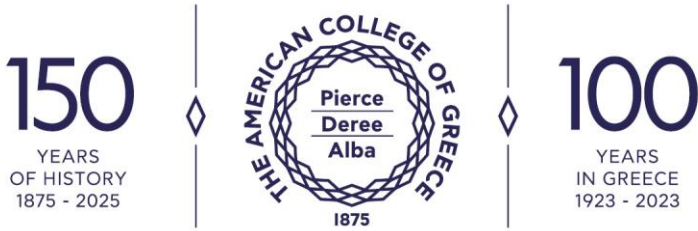
¹ See, indicatively, laws on equal treatment and non-discrimination: 4443/2016, 4097/2012, 3896/2010, 3769/2009 (Directive 2004/113/EC; EEL 373/37); on the protection of maternity: Art. 36 in 3996/2011, Art. 3 and Art. 20 in 3896/2010, Art. 141 & Art. 142 in 3655/2008, and Art. 52 και 53 in 3528/2007.

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- ethnicity;
- language;
- religion or belief;
- pregnancy;
- genetic information;
- bodily appearance;
- movement;
- disability;
- social origin and birth;
- property;
- political or other opinion;
- family situation;
- marital status;
- dependency or caring for dependents;
- citizenship status;
- veteran or military status;

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

ACG, as an educational institution that respects diversity and is committed to inclusion, is dedicated to fostering the education of the whole person and strives to provide an environment that encourages the search for truth and freedom of inquiry. This Policy aims to guarantee that each ACG community member is treated fairly and with respect within an educational environment free of discrimination, harassment and sexual misconduct, including sexual or gender-based harassment, sexual assault, sexual exploitation and relationship/dating violence, bullying, stalking, victimization,



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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.

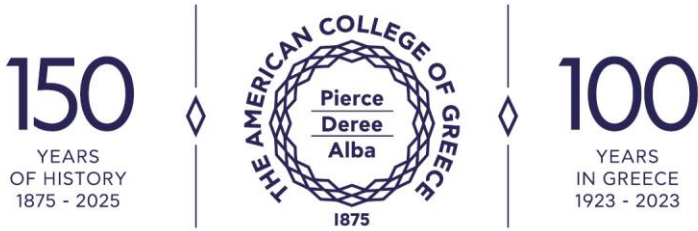
In offering US-style education in Greece, ACG is committed to reflecting the best practice among American institutions, through the creation of a responsive educational setting, where cultural diversity, inclusion and equal treatment, the dignity of and respect for all are protected. The value of diversity and the promotion of equality and inclusion permeate all aspects of academic and learning support, facilities, services and the student engagement environment.

ACG strives to adopting an affirmative action plan to enhance equal employment opportunities. That includes establishing mechanisms to recruit, support and retain faculty and staff with a commitment to fostering a diverse and inclusive academic community.

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 policies and procedures.

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

ACG strives to protect students and the ACG Community against



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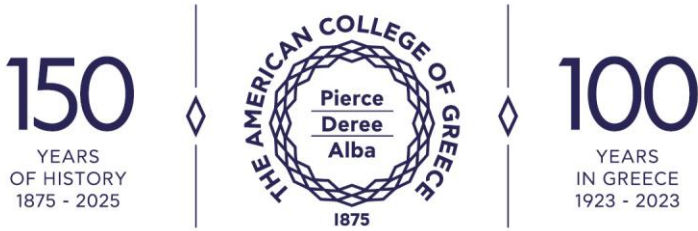
unlawful treatment based on protected characteristics and to ensure that all ACG Community members are aware of their rights and responsibilities in relation to Equality, Diversity and Inclusion.

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 ACG by-laws to ensure efficient response.

ACG is committed to training and developing students and staff in relation to equality and diversity: indicative examples include the 2018-19 Cultural Diversity Training addressed to all faculty and staff, the ACG-wide Diversity and Inclusion campaign in Spring 2019, the Non-Discrimination Policy training for faculty and staff (ongoing), and a rich student life programming led by Student Affairs, focused on equality and diversity topics and employing experiential learning methods.

ACG supports and promotes diversity-focused initiatives through tangible financial and structural resources. These efforts aim to enhance diversity education, research, and student support. Additionally, ACG maintains robust accountability systems to track progress, ensure compliance, and promote continuous self-assessment in alignment with the principles outlined in this Policy.

ACG is committed to Equality and Diversity Policy monitoring and to using 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 supports the assessment of



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compliance of each new Policy with the principles enshrined in this Policy and can lead to insights regarding the need to revise and remove existing policies, activate decision-making and initiate organizational change. The performance of equality analyses is led by the Office of College Legal Affairs and Policy, and supported by the Offices of the Senior Vice President of Administration and the Office of the Dean of Students, as well as faculty, and staff with relevant competences and expertise on those issues.

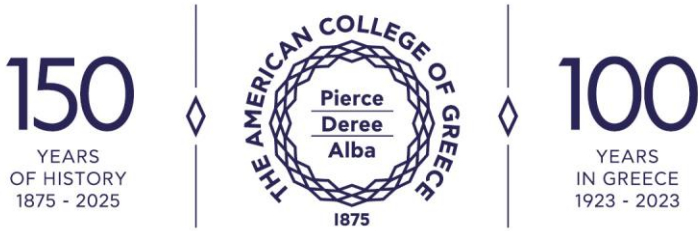
ACG strives to secure appropriate and sufficient evidence and documentation, internal and external information, and targeted consultation. The identification of what may adversely affect protected groups, justification of decisions regarding this Policy, and proposed action, as well as monitoring and review, are grounded in the outcomes of equality analysis and reflected in the Equality Impact Assessment form.

This Policy shall be enforced alongside [Chapter B - ACG Non-Discrimination, Harassment and Sexual Misconduct Policy](#) below which provides 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



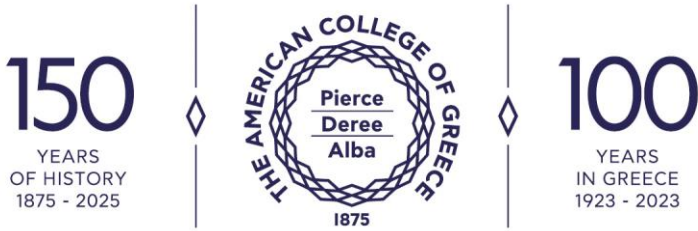
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staff, as prescribed by [Chapter B - ACG Non-Discrimination, Harassment and Sexual Misconduct Policy](#) below.

- 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, to protect the values, aspirations and diversity of all students.
- Enhance ACG's operational capacity to support the growing number of students with disabilities and diverse educational and learning needs, while ensuring a universally accessible learning environment and taking measures to improve physical access to all buildings and grounds.

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 all students and prospective students of the College's higher education division, as well as associated visitors and guests. Moreover, this Policy also applies to all members of the Pierce community, namely all current and potential Pierce students subject to the relevant Greek law regarding child protection and the ACG Child Protection Policy. The values enshrined in this Policy also apply to faculty and staff as



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members of the ACG Community (see [Chapter B - ACG Non-Discrimination, Harassment and Sexual Misconduct Policy](#) below).

This Policy applies to all individuals on ACG premises, as well as off-campus locations where scheduled ACG programs and activities take place. Incidents occurring within virtual spaces, in the context of electronic communications, also fall within the scope of this Policy. ACG will actively encourage and commit, where appropriate, all external partners and stakeholders to adherence to this Policy.

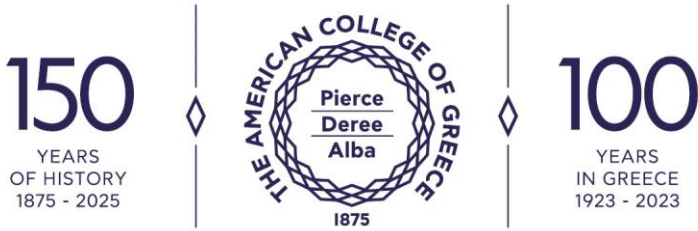
4. Definitions

4.1. Equality

Equality refers to the state or quality of being equal in status, rights, opportunities, or value. It embodies principles of fairness and impartiality, asserting that all individuals should be treated with the same dignity and respect, regardless of their racial, gender, religious, or socioeconomic status differences, abilities or any of the protected characteristics mentioned in [1. Introduction](#) below. In social and political contexts, it often refers to advocating for policies and practices that aim to eliminate discrimination and ensure equitable access to opportunities and resources.

4.2. Diversity

Diversity refers to the presence and inclusion of all individuals, ideas or elements within a group, organization, or society. Dimensions of diversity include, but are not limited to, age, sex, gender and/or gender identity, reassignment or expression, including non-binary, sexual orientation, race, nationality or national origin, language, religion pregnancy, genetic



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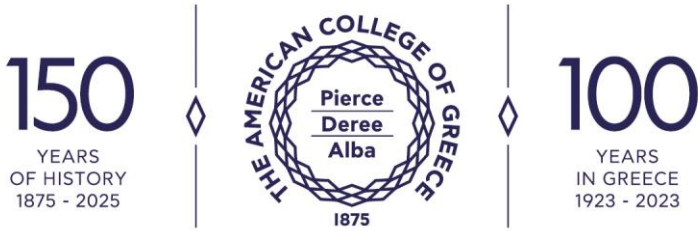
information, disability, social origin, property, political or other opinion, citizenship status, veteran or military status or any other protected characteristics as mentioned in [1. Introduction](#) above. Promoting diversity involves recognition, respect and value of these differences, as well as protection of inclusivity and equity. It is often accepted as a source of strength, creativity, and innovation, as diverse perspectives and experiences can enhance decision-making processes and foster a more vibrant and dynamic community or workplace.

4.3. Inclusion

Inclusion indicates the practice or Policy of ensuring that all individuals, regardless of their differences, feel welcomed, respected, valued and empowered to fully engage in the activities of a community or an organization. It involves promoting diversity and actively working to remove barriers to participation and belonging. Inclusion goes beyond mere tolerance or acceptance; it demands actively seeking out and valuing diverse perspectives, experiences and identities. Inclusive practices can be composed of promoting accessibility, providing support and accommodations, fostering a culture of belonging, and actively addressing discrimination and bias. The objective of inclusion is to create a sense of belonging and equity for all individuals, mainly leading to stronger communities, organizations and societies.

4.4. Harassment

Harassment refers to any unwanted or unwelcome behavior that is persistent, offensive, or threatening in nature and creates a hostile, intimidating, or uncomfortable environment for the recipient. It can be observed in various forms, including verbal, physical, or visual actions, and



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may be targeted towards an individual or a group based on their race, ethnicity, gender, sexual orientation, religion, disability, or other protected characteristics. Instances of harassment can relate to derogatory comments, slurs, insults, threats, unwanted advances, physical intimidation, bullying, or cyberbullying. Harassment can be observed in various settings, including the workplace, schools, online platforms, public spaces, and social interactions. It is often characterized by its negative influence on the victim's well-being, dignity and sense of safety and may violate laws or policies prohibiting discrimination and harassment.

4.4.1. Sexual or gender-based harassment

Sexual harassment occurs when an individual engages in unwelcome conduct of a sexual or gender-based nature that interferes with an individual's employment, access to programs, activities, opportunities and living environment, and detrimentally affects a reasonable person. It includes but is not limited to;

- any verbal or physical conduct or offensive remarks of a sexual nature: lewd or sexually suggestive comments, jokes, gestures and noises about a person's sexuality or sexual appearance; intentionally or unintentionally touching, pinching, patting, grabbing or brushing against another individual's body, especially private body parts;
- unsolicited, unwelcome, and unwanted sexual advances;
- requests for sexual favors; this includes, but is not limited to, implicit or explicit suggestions that submitting to or rejecting such conduct will be a factor in academic or employment evaluations, or participation in College activities;

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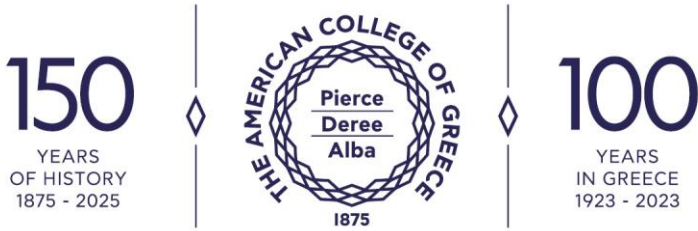
- visual displays of degrading sexual images; specifically, display of sexually demeaning or pornographic materials (pictures, graffiti, objects, reading materials) on ACG premises or digital environments through which persons to whom this Policy applies upload/access content;
- sexually suggestive conduct;
non-physical actions such as digital media stalking, cyberbullying, and nonconsensual recording of sexual activity.

4.5. Bullying

Bullying is a type of aggressive behavior which can be indicated by repeated, intentional harm inflicted upon another individual who typically has less power or ability to defend themselves. This harmful behavior can take various forms, including physical, verbal, emotional, or relational actions, and can consistently be observed over time.

Examples of bullying include:

- Physical bullying: Hitting, kicking, pushing, or other forms of physical aggression.
- Verbal bullying: Name-calling, teasing, taunting, or making threats.
- Emotional bullying: Intentionally excluding someone, spreading rumors or gossip, or manipulating relationships to cause harm.
- Cyberbullying: Using electronic devices and online platforms to harass, intimidate, or humiliate others, such as through malicious text messages, social media posts, or emails.



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Bullying is typically characterized by an imbalance of power, where the bully seeks to exert control or dominance over the victim. It can occur in various settings, including schools, workplaces, social groups, or online environments. Bullying can have serious and long-lasting effects on the victim's physical and mental health, self-esteem, and overall well-being, and it is often important to address and prevent it through proactive measures and intervention strategies.

4.6. Victimization

Victimization involves the process or experience of being victimized, which contains being subjected to harm, mistreatment, or injustice by another individual or group. It can take various forms, including physical, emotional, financial, or psychological harm, and may lead to various acts such as assault, theft, harassment, discrimination, or abuse. Victims of victimization may experience feelings of vulnerability, powerlessness, fear, or trauma as a result of the harm inflicted upon them. Victimization can occur in different contexts, including interpersonal relationships, institutions, communities, or broader societal structures. Addressing victimization often includes providing support and resources to victims, holding perpetrators accountable, and implementing measures to prevent further harm or injustice.

5. College's expectations

- All ACG Community members, including students, faculty and staff, should not discriminate while undertaking studies, activities, or responding to assigned duties, nor should they attempt to encourage peers, or others to do so.
- All ACG Community members should not harass, intimidate, victimize or

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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 [Chapter B - ACG Non-Discrimination, Harassment and Sexual Misconduct Policy](#) below).

- 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.
- Students should inform a person in a position of responsibility, a Responsible Employee (under [6. Procedure](#) below) or the Office of the Dean of Students (see [Chapter B - ACG Non-Discrimination, Harassment and Sexual Misconduct Policy](#) below) if they suspect that discrimination is taking place.
- Students studying at ACG are expected to adhere to the above expectations at all times.

6. 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 report.

Students may report incidents involving prohibited conduct under this Policy to the Office of the Dean of Students.

For urgent concerns, the Aghia Paraskevi Campus Main Gate (tel: +302106009800 ext. 1100, email address: security.services@acg.edu), and

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the Downtown Campus Front Desk (tel: +302108964531, email address: security.services@acg.edu) are staffed 24/7 and will provide immediate response and referrals to on and off campus resources.

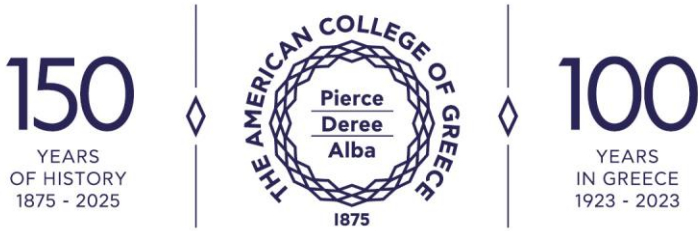
ACG Nurses can be reached during ACG Health & Wellness Center operating hours (+30600980 ext. 1500, 1093, 1193).

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 to whom they are comfortable disclosing such information. All ACG employees are “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. Responsible Employees include:

- ALL faculty
- ALL staff in supervisory positions, including supervisors of student employees (student assistants and on-campus interns)
- ALL staff who have specific responsibility for the well-being 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
- Instructors, teaching assistants, coaches, advisors, and program counselors, such as the Study Abroad Program, who teach, advise, coach or mentor students

Students can disclose in confidence to Responsible Employees. Students



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must understand the reporting obligation of Responsible Employees to the Office of the Dean of Students before they reveal any information.

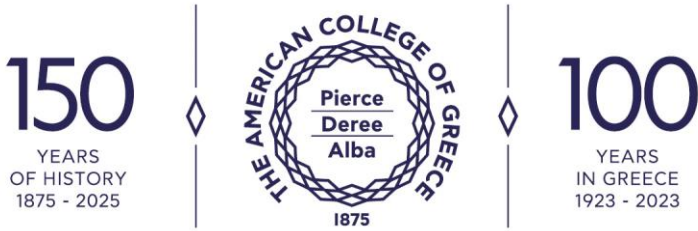
Students who have disclosed a concern will be invited by the Office of the Dean of Students to attend a first, informal meeting to discuss and clarify their concerns. In this initial meeting, students are guided through reporting processes and hearing options:

- informal reporting, hearing and resolution, if applicable in light of the relevant Greek law and taking into account the gravity of the reported incident;
- formal reporting and hearing processes;
- anonymous reporting.

Accordingly, a written record of the informal meeting and the selected course of action will be made and stored in a confidential folder which is held electronically by the Office of the Dean of Students.

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 well-being 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 [Chapter B - ACG Non-Discrimination, Harassment and Sexual Misconduct Policy](#) below.

Investigation of reported conduct or concerns can be informal or formal, as prescribed by [Chapter B - ACG Non-Discrimination, Harassment and Sexual Misconduct Policy](#) below, depending on the nature and severity of the alleged misconduct. The investigation is led by the Office of the Dean of Students if



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the incident involves students. The Office of the Senior Vice President of Administration is involved in the investigation of incidents concerning employees. During the period following the report, ACG will offer the student, and any other ACG Community member involved in the procedure, ongoing support, including the adoption of suitable interim measures.

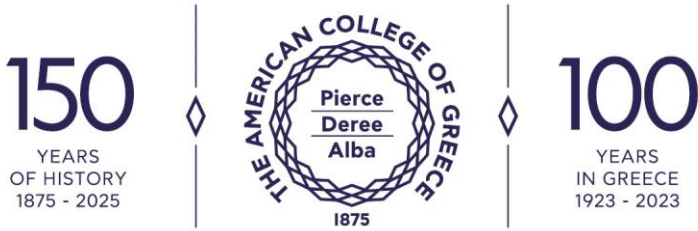
The disciplinary procedure applies to reported incidents raising concerns about the violation of the Student Code of Conduct, [Chapter B - ACG Non-Discrimination, Harassment and Sexual Misconduct Policy](#) below, or any other ACG Policy referred to therein.

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

7. Training and Support for Employees and Students

Faculty and Staff play a pivotal role in fostering an inclusive, equitable, and supportive educational environment. To empower them in this capacity, ACG is committed to:

- a) Developing greater competency in cross-cultural, inclusive communication;
- b) Effectively engaging students in conversations related to diversity, inclusion, equity and justice;
- c) Using inclusive teaching approaches that address the range of academic learning styles and needs of all students, including universal design for learning approaches and materials;
- d) Providing safe, supportive environments that promote student learning and address classroom dynamics;



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- e) Requiring training for all ACG employees involved in the Admissions process (including staff and faculty involved in the admissions process but located outside of the Office of Admissions) to make certain that issues of diversity and inclusion are understood at all levels to enhance the recruitment of a very diverse class of incoming students;
- f) Offering campus-wide trainings for students and ACG employees (faculty, administrators and staff at all levels) on issues around diversity and inclusion, and uphold a consistent expectation for all members of the community to engage in diversity education.

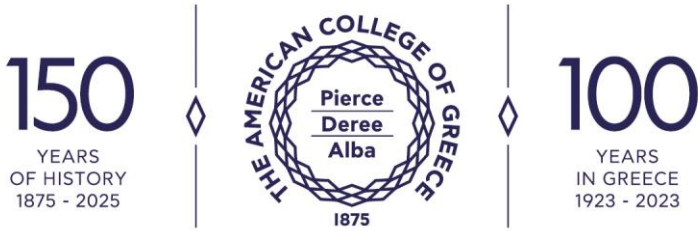
8. Responsibilities

It is the responsibility of all ACG Community members to adhere to and implement the principles of this Policy. Reports of violations will be addressed by Responsible Employees and ACG promptly, sensitively and confidentially, with a view to resolving the issue.

The Office of the Dean of Students is responsible for actively promoting and monitoring implementation of this Policy. In collaboration with the Office of the SVP of Administration and the Office of College Legal Affairs and Policy, this Policy is subject to systematic, biannual review (see below, 8).

The Offices of the SVP 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



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concerns about this Policy to the Office of the Dean of Students (incident@acg.edu) and, in the case of ACG employees, the Office of the SVP of Administration (hr@acg.edu).

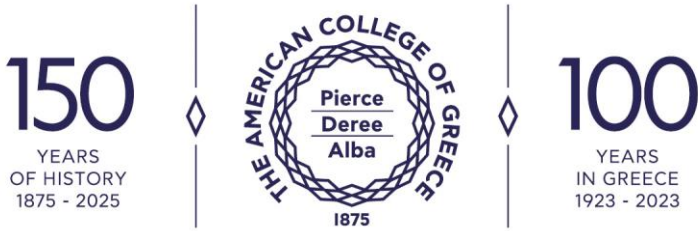
9. Record keeping

ACG must keep records and retain documentation that substantiates the effectiveness of communication and action taken in response to incidents falling within the scope of this Policy. Indicative examples of required record keeping include records showing that there was an adequate number of announcements made, tracking the hour of the day when an announcement was made, providing evidence of outreach to the general community or segments thereof, and ensuring that the message was conveyed promptly and clearly.

ACG shall maintain the records required by auditing bodies, either public authorities or accrediting bodies in Greece, the US and internationally. Such record keeping, for example, concerns records indicating the racial composition of the student body, faculty and administrative staff for each academic year; records sufficient to document that scholarship and other financial assistance is awarded on a racially nondiscriminatory basis; copies of all brochures, catalogues and advertising dealing with student admissions, program, and scholarships; and copies of material used by or on behalf of ACG to solicit contributions. Such records must be maintained for at least three years.

10. Monitoring and Review

This Policy will be reviewed **every two years** to ensure that it meets the diverse needs and expectations of students, faculty, staff and the



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institution as a whole. Review processes are initiated by the Office of the Dean of Students. The Offices of Student Affairs, Academic Affairs, International Student Services, the ACG Health & Wellness Center, the ACG Counseling Center, the Sexual Assault Response Team, and Campus Security are required to provide insight ahead of the review process, in which ACG commits to engage the Student Government by initiating open dialogue and deliberation.

In monitoring and reviewing this Policy, the Office of the Dean of Students also takes into account input afforded by the Sexual Assault Response Team. SART meets annually, in July, to develop and revise operating guidelines and review how cases/concerns were addressed by ACG in the preceding academic year.

11. External Reporting

ACG reports data of pertinence to the protective scope of the ACG Equality, Diversity and Inclusion Policy to US authorities and accrediting bodies, and the Open University as the validating partner of its College/higher education division (Annual Monitoring Report).

12. Other related documents

- ACG Whistleblower Policy;
- ACG First Aid Protocols;
- ACG Security Emergency Procedures Protocol;
- Health & Safety Policy;
- Deree Student Code of Conduct;
- ACG Child Protection Policy.



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Chapter B

ACG Non-Discrimination, Harassment and Sexual Misconduct Policy 2025

Contents

ACG Non-Discrimination, Harassment and Sexual Misconduct Policy 2025	23
1. Introduction	26
2. Purpose	27
3. Scope	28

(ACG 150 Years Celebration Logo)

4. Definitions 30

4.1.	Discrimination	30
4.2.	Harassment.....	30
4.2.1.	Sexual harassment	31
4.2.2.	Gender-based harassment	32
4.2.3.	“Hostile environment” and “quid pro quo” sexual/gender harassment ..	32
4.3.	Sexual misconduct.....	33
4.4.	Sexual Assault	33
4.4.1.	Non-consensual sexual intercourse.....	34
4.4.2.	Non-consensual sexual contact	34
4.5.	Sexual Exploitation	34
4.6.	Relationship/dating violence	35
4.7.	Unwelcome conduct.....	35
4.8.	Stalking and cyber-stalking.....	35
4.9.	Retaliation Policy	36
4.10.	Affirmative consent.....	36
4.11.	Force/Coercion	37
4.12.	Incapacitation (incl. sexual activity following use of drugs or alcohol)	38
4.13.	Parties.....	38
4.13.1.	Reporting Party	39
4.13.2.	Responding Party	39

5. Urgent concerns 39

6. Confidentiality and resources 41

6.1.	Confidential Resources	43
6.2.	Responsible Employees.....	43
6.3.	Offices of the Dean of Students and Senior Vice President of Administration and Human Resources.....	44
6.4.	SART (Sexual Assault Response Team)	46

(ACG 150 Years Celebration Logo)

7. CONDUCT PROHIBITED BY LAW	47
8. RESPONSE TO PROHIBITED CONDUCT, RIGHTS AND OBLIGATIONS.....	49
8.1. For students.....	49
8.2. For employees	50
8.3. For third parties	50
9. INTERIM MEASURES AND NON-RETALIATION	51
10.SANCTIONS	52
10.1. Reprimand and Written Warning.....	53
10.2. Reflective Work	53
10.3. Restriction/loss of ACG Privileges	54
10.4. Removal from the Residence Complex	54
10.5. Student Conduct Probation.....	54
10.6. No-Contact Order	55
10.7. Temporary Suspension.....	55
10.8. Suspension.....	56
10.9. Expulsion	56
11.POSSIBLE SANCTIONS FOR ACG EMPLOYEES IN VIOLATION OF THIS POLICY	57
12.REPORTING PROCESS.....	58
12.1. Filing of an informal report.....	60
12.2. Filing of a formal report.....	61
12.3. Anonymous reporting	62
13.INVESTIGATION, NOTIFICATION, HEARING AND APPEALS PROCESSES.....	62
13.1. Investigation	62

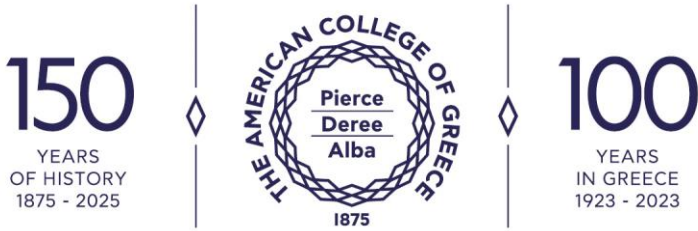
(ACG 150 Years Celebration Logo)

13.2. Notification.....	63
13.3. Hearing Process	64
13.4. Appeals Process	65
14.GUIDELINES FOR FIRST RESPONSE TO A VICTIM OF MISCONDUCT.....	67
14.1. General Guidelines:	67
14.2. Helpful Language for Responsible Employees;	67
15.TRAINING AND AWARENESS-RAISING	69
16.REVIEWING PERIODS.....	71
17.CLIMATE SURVEYS	71

1. Introduction

The American College of Greece [ACG] is dedicated to adding distinctive and sustainable value to the lives of students and maintaining a campus ethos of mutual respect, care and responsible action. This Policy outlines the institutional commitment to fostering a safe, respectful, and inclusive environment for all students, staff, and faculty. It defines unacceptable behaviours, establishes procedures for reporting and addressing reports of misconduct, and ensures protection against retaliation.

In that spirit, ACG codified and merged the “ACG Non-Discrimination, Anti-Harassment, Sexual Misconduct, Relationship Violence and Stalking” (2019) and the “ACG Harassment and Sexual Misconduct Policy” (2021) into one concrete Policy applicable to all ACG community members. Through the implementation of this Policy, ACG aims to uphold the highest standards of integrity and equality within its community.



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2. Purpose

This Policy is dedicated to upholding the principles of diversity, equality, and human dignity within the ACG community. It reflects the commitment to fostering an inclusive and respectful environment where every community member—students, faculty, staff, and visitors/third parties—is entitled to fair treatment and a safe educational space free from discrimination, harassment, and sexual misconduct. Manifestations of relevant misconduct vary: from gender-based harassment, sexual assault and exploitation, relationship violence and stalking to intimidation and retaliation against whistleblowers who report prohibited conduct in good faith (see ACG Whistleblower Policy).

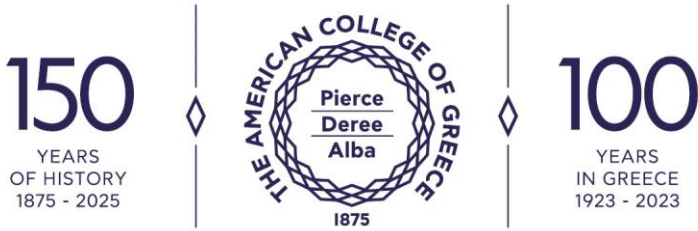
ACG recognises that discrimination constitutes a significant root cause of harassment, alongside oppression and other socioeconomic factors. Moreover, ACG acknowledges that the experience of harassment is context-specific and needs to be assessed on a case-by-case basis.

All prohibited conduct under this Policy is proscribed by law and will not be tolerated. The Policy draws on (1) terms and standards set by national/state² and EU laws and policies, and (2) relevant ACG Policies, Protocols and Codes of Conduct.

ACG is committed to preventing and responding to such incidents, and to supporting survivors.

ACG actively encourages advocacy and activism among students, faculty, and staff, promoting efforts to combat harassment both on campus and in the

² the laws of the Hellenic Republic and standards set by the Ministry of Education of Greece.



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wider society, through support networks and partnerships at local, national, and international levels.

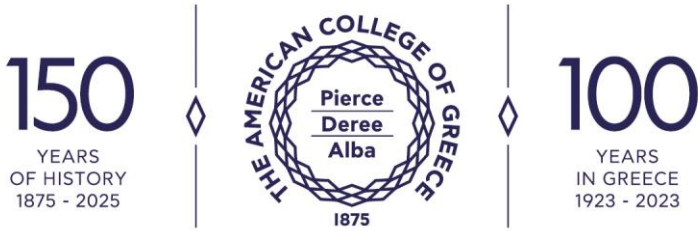
Moreover, ACG affirms that the above policies are easily accessible on the ACG website to all community members, including people with differences and/or individuals who are not familiar with the English language, while ensuring that employees and students are guided through this Policy during orientation, fostering awareness and understanding from the outset.

3. Scope

With regard to the objective scope, this Policy applies to all current and prospective students of the higher education division, namely Deree and Alba, as well as all employees, faculty and staff, regardless of sexual orientation or gender identity; third parties, if the misconduct occurs on ACG campuses or premises, such as athletic facilities, the ACG Residence Complex and apartments; and to ACG appointees and any community member participating in ACG programs and activities on and off campus, including programs abroad.

Moreover, this Policy applies to all members of the Pierce community, namely all current and potential Pierce students, as well as employees, faculty and staff, subject to the relevant Greek law regarding child protection and the ACG Child Protection Policy, accessible on Blackboard and the Pierce website.

Individuals to whom this Policy applies are subject to appropriate hearing processes and disciplinary sanctions or measures as per the Student Code of Conduct, the Faculty Code of Conduct, the Employee Handbook and any other Policy specific to the respective ACG populations.



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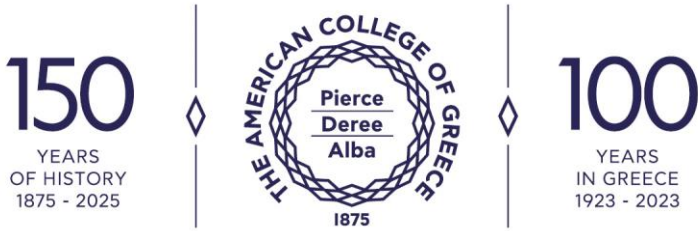
Persons to whom the Policy applies, who are in a higher position vis-à-vis fellow community members within the organizational structure and administrative hierarchy of ACG, have a special obligation not to engage in prohibited conduct, including consensual sexual or romantic relationships most importantly with students, student assistants and on-campus interns.

Upon entering the ACG Community, employees and students are expected to inform Human Resources and the Office of the Dean of Students respectively about existing relationships of that nature with fellow ACG community members.

Managers and supervisors are specifically expected to serve as models of appropriate conduct for other employees, adhere to and enforce the Policy, and not engage in discrimination, harassment, retaliation or sexual assault.

Managers and supervisors have a duty to report prohibited conduct under the Policy that they witness/observe, learn about, or reasonably suspect has occurred. Knowingly allowing prohibited conduct to continue or adopting a casual approach to the enforcement of the Policy shall result in disciplinary action and sanctions. ACG will hold managers and supervisors to a higher standard of accountability.

This Policy applies to all ACG campuses and premises; off-campus locations in the US, Greece and abroad, where ACG programs take place; study abroad and conference/professional development destinations; virtual spaces, within which electronic communications involving persons to whom the Policy applies take place, for example, online learning environments, email accounts, social media, cell phone audio/video and text messaging conversation applications and platforms, etc.



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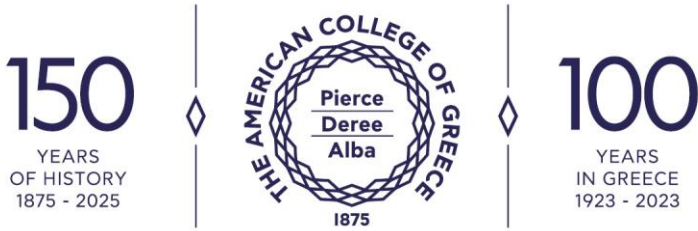
4. Definitions

4.1. Discrimination

The unjust or prejudicial treatment of individuals or groups resulting in unequal opportunities, access, or rights based on characteristics such as their age, sex, gender and/or gender identity, reassignment or expression, including non-binary, sexual orientation, race, nationality or national origin, ethnicity, language, religion or belief, pregnancy, genetic information, bodily appearance, movement, disability, social origin, property, political or other opinion, family situation, marital status, citizenship status, veteran or military status, or on any other protected characteristics as described in [ACG Equality, Diversity and Inclusion Policy](#) above.

4.2. Harassment

Harassment refers to any unwanted or unwelcome behavior that is persistent, offensive, or threatening in nature and creates a hostile, intimidating, or uncomfortable environment for the recipient. It can be observed in various forms, including verbal, physical, or visual actions, and may be targeted towards an individual or a group based on their race, ethnicity, gender, sexual orientation, religion, age, disability or difference, marital, citizenship of veteran/military status or other protected characteristics, as described in [ACG Equality, Diversity and Inclusion Policy](#) above. Instances of harassment can relate to derogatory comments, slurs, insults, threats, unwanted advances, physical intimidation, bullying, or cyberbullying. It is often characterized by its negative influence on the victim's



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well-being, dignity and sense of safety and may violate laws or policies prohibiting discrimination and/or harassment.

4.2.1. Sexual harassment

Sexual harassment occurs when an individual engages in unwelcome conduct of a sexual or gender-based nature that is sufficient to interfere with an individual's employment, access to programs, activities, opportunities and living environment, and to detrimentally affect a reasonable person. It includes but is not limited to;

- any verbal or physical conduct or offensive remarks of a sexual nature: lewd or sexually suggestive comments, jokes, gestures and noises about a person's sexuality or sexual appearance; intentionally or unintentionally touching, pinching, patting, grabbing or brushing against another individual's body, especially private body parts;
- unsolicited, unwelcome, and unwanted sexual advances;
- requests for sexual favors; this includes, but is not limited to, implicit or explicit suggestions that submitting to or rejecting such conduct will be a factor in academic or employment evaluations, or participation in College activities;
- visual displays of degrading sexual images; specifically, display of sexually demeaning or pornographic materials (pictures, graffiti, objects, reading materials) on ACG premises or digital environments through which persons to whom this Policy applies upload/access content;
- sexually suggestive conduct;
- non-physical actions such as digital media stalking, cyberbullying, and nonconsensual recording of sexual activity.



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4.2.2. Gender-based harassment

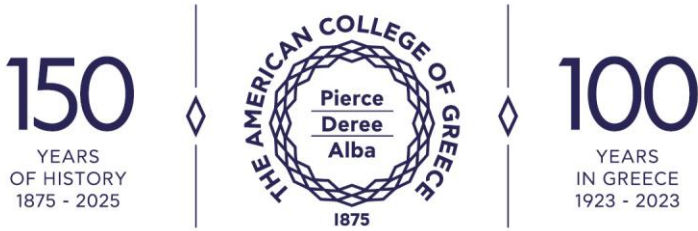
Gender-based harassment includes harassment based on gender, gender identity, or gender expression.

Gender-based harassment can include acts of aggression, intimidation, hostile verbal or non-verbal, graphic, physical, or other conduct, even if the acts do not involve conduct of a sexual nature when these are sufficiently severe, persistent, or pervasive and interfere with or limit an individual's ability to participate in the life of the community and to benefit from opportunities accessed through ACG programs and activities.

4.2.3. "Hostile environment" and "quid pro quo" sexual/gender harassment

"Quid pro quo", "this for that", sexual/gender harassment is defined as the form of harassment that occurs when sexual demands or requests for sexual favors are made by a person in authority, who can affect employment terms and conditions, privileges, hiring and firing, promotions and disciplinary actions and sanctions, training, performance evaluation and compensation. Such forms of harassment are prohibited by this Policy and all pertinent provisions in other AUG/ACG Policies and Procedures applicable to employees.

Recognizing that positions of authority exist also within student life (student leadership in Clubs/Organizations/Societies vis-à-vis student membership, Club/Organization/Society advisors vis-à-vis students, athlete-student team leaders/coaches vis-à-vis students/athletes and teams), this Policy also prohibits "hostile environment" or "quid pro quo" sexual/gender harassment within the student community.



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4.3. Sexual misconduct

Sexual misconduct relates to all unwanted conduct of a sexual nature, that violates an individual's rights, dignity, or sense of safety, and may encompass actions ranging from inappropriate comments to criminal acts such as assault, including, yet not limited to: sexual harassment, specifically engaging in unwanted conduct of a sexual nature or related to gender reassignment or sex, with the purpose or effect of violating one's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment; rape; physical unwanted sexual advances; intimidation, or promising resources or benefits in return for sexual favors; distributing private and personal explicit images or video footage of an individual without their consent; dating violence; domestic violence; gender-based violence; violence based on sexual orientation or gender identity or expression; sexual assault; stalking.

4.4. Sexual Assault

Any non-consensual act of a sexual nature, including unwanted sexual contact, that is carried out by force, threat, coercion, or when the victim is unable to give consent due to incapacitation or other factors. Sexual violence/assault includes physical sexual activity without prior clear and voluntary consent. Consent should be affirmative, unambiguous, conscious, and given in advance; consent is revocable.

Sexual violence includes but is not limited to:

- Sexual activity against a person's will through physical force, violence, threat, intimidation, manipulation, ignoring the objections of the other person etc;

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- Sexual activity where a person is incapable of giving consent, due to age, use of drugs or alcohol, intellectual or other disability, which prevents the individual from having the capacity to give consent;
- Rape, sexual assault/battery/abuse, coercion, domestic violence, dating violence and stalking.

Sexual assault is a form of sexual harassment that involves non-consensual intercourse or non-consensual sexual contact.

4.4.1. Non-consensual sexual intercourse

Non-consensual sexual intercourse includes force, threat of force or coercive conduct with purpose to engage in or attempt sexual intercourse with another individual, without affirmative consent, or where the other individual is incapacitated. Any form of penetration, however slight, with a body part or an object amounts to sexual intercourse.

4.4.2. Non-consensual sexual contact

Non-consensual sexual contact involves force, threat of force or coercive conduct with purpose to have or attempt sexual contact with another individual, without affirmative consent, or where the other individual is incapacitated; touching, fondling and any other intentional contact, over or under an individual's clothing, with private body parts for purposes of sexual gratification.

4.5. Sexual Exploitation

Sexual exploitation involves non-consensual use of another individual's sexuality or nudity, such as voyeurism; dissemination, streaming and posting pictures or videos of another person engaging in a sexual act, exposing private body parts, being undressed/nude or in a place and time where privacy is

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reasonably expected, without the individual's affirmative consent; making another individual vulnerable to nonconsensual sexual activity by use of alcohol or drugs; prostituting another person; knowingly exposing another individual to an STD, without their knowledge.

4.6. Relationship/dating violence

Relationship/dating violence includes acts of sexual misconduct, physical assault, sexual exploitation or stalking. Relationship/dating violence involves violent conduct by a person who aims at exerting control over a current or former intimate partner. Such violence can occur within current or past sexual, dating, domestic or other intimate relationships.

4.7. Unwelcome conduct

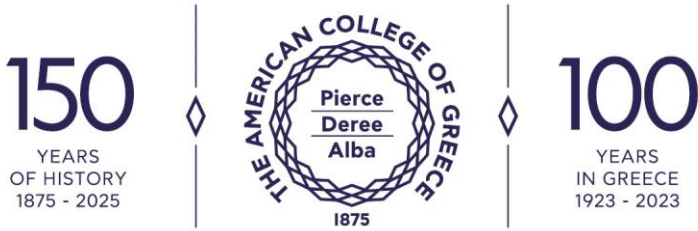
Unwelcome conduct is defined as conduct not requested or invited and perceived as undesirable or offensive. Assessment of whether conduct is unwelcome shall rely on the evaluation of all circumstances, including objective and subjective factors, and be guided by the following premises:

- absence of a "no" does not by itself mean "yes";
- clothing, or gender, race, sexual identity and orientation cannot be grounds for inferring that conduct is welcome;

an individual can stop welcoming sexual contact at any time, and can welcome particular sexual acts but not others, regardless of whether a dating, marital, and/or sexual relationship exists between the parties.

4.8. Stalking and cyber-stalking

Stalking occurs when a person follows, monitors, observes, threatens or communicates to or about a person, or interferes with another person's property, thereby causing a reasonable person to fear physical abuse or



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experience substantial emotional distress and mental suffering. Stalking refers to a course of conduct including two or more acts, regardless of whether all acts in the course of conduct are unwelcome, or performed directly by the stalker or, indirectly, through other parties.

Cyber-stalking occurs when electronic media, such as the internet, social networks, cell phones, text messaging, or other similar devices or forms of electronic communication are used.

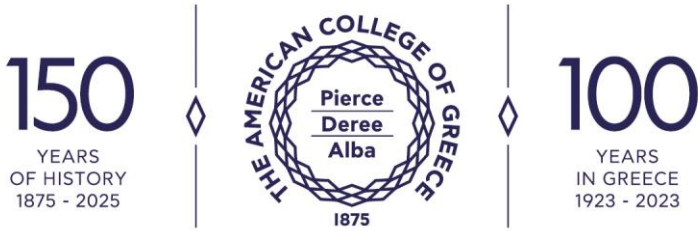
4.9. Retaliation Policy

Retaliation is any adverse action taken against an individual behaving in good faith to report prohibited conduct under this Policy and any other ACG Policy and Procedure or to participate in any investigation or proceeding under this Policy and the policies prescribing hearing and sanctions that are applicable to community members; threats, harassment and any conduct that would intimidate or discourage a reasonable person from reporting prohibited conduct under the Policy constitutes retaliation.

ACG prohibits retaliation against anyone who reports sexual misconduct, assists another in making a report or participates in an investigation of a report. (see paragraph 5.4 of the Whistleblower Policy).

4.10. Affirmative consent

For affirmative consent to exist, engagement in sexual activity must be a knowing, voluntary, and mutual decision among all involved parties. Words or actions can amount to affirmative consent, as long as they indicate clear permission and willingness of all participants to engage in the sexual activity.



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Assessment of whether affirmative consent has been given/obtained shall rely on the evaluation of all circumstances, including objective and subjective factors, and be guided by the following premises:

- Consent shall not be inferred from silence or lack of resistance.
- Affirmative consent and the use of force/coercion or taking advantage of the incapacitation of another individual are irreconcilable.
- Consent cannot be obtained from someone who is under the legal age to consent at the time of the incident.
- The extent to which the Reporting Party's words or actions indicate affirmative consent to engage in sexual activity shall be assessed on the grounds of how an average reasonable person in the position of the Responding Party perceives the Reporting Party's words or actions as expressed consent

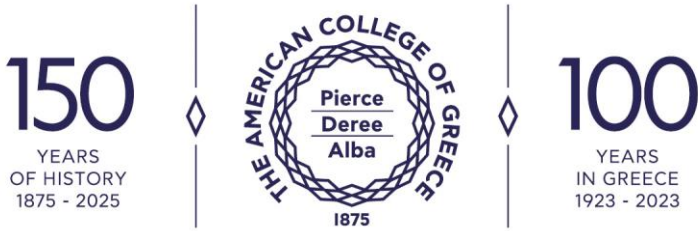
It is expected of all persons to whom this Policy applies:

- Not to make assumptions, but rather stop and clarify verbally the willingness to continue, if ambiguity arises during sexual activity.
- To cease sexual activity immediately when consent initially given is withdrawn.

Current or future consent is not implied by prior consent, and consent for specific sexual activity does not necessarily encompass any other sexual act. This applies even in the context of ongoing intimate relationships/dating.

4.11. Force/Coercion

Force is the use of physical violence or intimidation, or the threat of such conduct, to interfere with a person's freedom to choose whether or not to participate in sexual activity.



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Coercion occurs when an individual reasonably fears immediate or future physical, emotional, or other harm as a result of explicit or implied threats or intimidation aimed at interfering with a person's freedom to choose whether or not to participate in sexual activity.

4.12. Incapacitation (incl. sexual activity following use of drugs or alcohol)

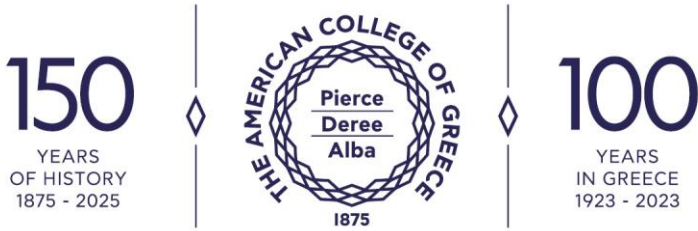
Incapacitation is the state of lacking the ability to knowingly and voluntarily choose to engage in sexual activity or to make rational judgments and/or consent to sexual activity. Incapacitation can be temporary or permanent.

An individual's ability to give consent can be limited by mental or physical conditions, being involuntarily restrained, asleep or unconscious, or unaware that sexual activity is occurring; incapacitation due to intoxication (use of drugs or alcohol) does not serve as an excuse for committing prohibited conduct under this Policy. The standard applicable in evaluating incapacitation is that of the perspective of a sober, reasonable person in the Responding Party's position.

Signs of incapacitation includes, among others, symptoms of excess alcohol or drug consumption such as vomiting, inability to focus, disorientation, inability to maintain balance, communicate coherently, unresponsiveness or unconsciousness.

4.13. Parties

"Parties" refers collectively to the Reporting Party and the Responding Party. In cases where a third party is involved as either the Reporting or Responding Party, ACG reserves the right to notify the local authorities



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immediately, either prior to or concurrently with the initiation of internal investigation and disciplinary processes.

4.13.1. Reporting Party

“Reporting Party” refers to any person to whom the Policy applies, specifically to a member of the ACG community (student; employee; third party, if the misconduct occurs on ACG campuses or premises, such as the ACG Residence Complex and apartments; ACG appointees and any community member participating in ACG programs and activities on and off campus, including programs abroad) who reports being subject to an incident of harassment and misconduct to ACG.

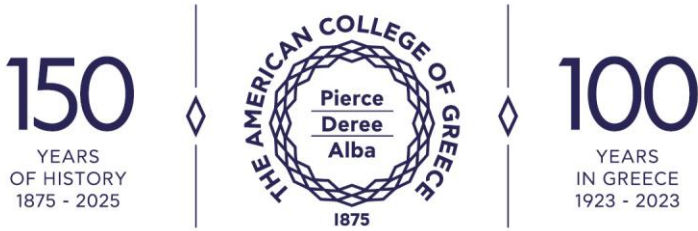
4.13.2. Responding Party

“Responding Party” refers to a member of the ACG community (student; employee; third party, if the misconduct occurs on ACG campuses or premises, such as the ACG Residence Complex and apartments; ACG appointees and any community member participating in ACG programs and activities on and off campus, including programs abroad) who has been accused of an alleged incident of misconduct.

5. Urgent concerns

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

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



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

ACG first response resources:

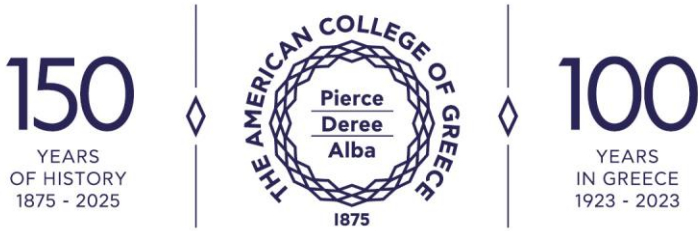
- Are trained to inform about reporting options and to offer guidance for preserving evidence in case of rape or sexual violence until external emergency response professionals (first aid or police, or both, depending on Reporting Party's/victim's preference) arrives.
- Cannot collect or preserve DNA evidence.
- ACG Nurses receive Sexual Assault Nurse Examiner training (online), but are not allowed to perform checks that exceed the scope of care outlined in ACG medical protocols (ACG First Aid Protocols), specifically physical examination, including a pelvic exam to collect DNA evidence. ACG Nurses are aware of the type of evidence that can be crucial in a forensic investigation, and make every effort to help the victim preserve evidence (outer clothing, underpants worn at the time of and after the incident), or recommend that the victim swab their own oral cavity using cotton swabs, and advise the victim to not shower or wash pubic area, cervix, vaginal or penile areas. ACG Nurses advise the victim to note areas of injury (bruising, bite marks, scratches) for providing this information to the police or public hospital professionals undertaking the DNA examination. An evidence-collection checklist that can aid sexual assault forensic examination is shared with the victim of alleged misconduct.
- ACG Nurses make referrals for follow up care, and are trained to educate victims of sexual misconduct about STDs and pregnancy risks.

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- When ACG Nurses are not on campus, the victim is referred to external emergency response professionals (the police or public hospital). Campus Security, Responsible Employees and the ACG Counseling Center shall not collect, preserve or provide guidance about preservation of DNA evidence.
- Sexual assault exams are conducted by the Forensic Service of the area where the crime was reported by the victim and are free of charge. Crimes reported within the Attica region, are handled by the Athens Forensic Service, 10 Anapafseos Str., 116 36 Athens, Greece (+30 2109244900). The exam involves description of the injuries, pelvic exam, vaginal/penile/anal swabs, head and pubic hair samples, fingernail scrapings, and blood and saliva samples for DNA identification. Victims of sexual assault or rape are allowed to bring a friend or other support person during the forensic exam. Trained ACG employees handling an incident involving a study abroad/international student or student resident will offer to act as the support person during the forensic exam.

6. Confidentiality and resources

ACG Community members involved in responding to prohibited conduct under the Policy are required to maintain a high degree of confidentiality towards ensuring the fairness and integrity of the process, and the effectiveness of response and care provided to the Reporting Party of the alleged misconduct. ACG Community members are not expected to investigate, preserve evidence or determine the facts of an incident unless they are specifically entrusted with this responsibility in this Policy. ACG will



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not require participants in the investigation or disciplinary hearing processes to sign non-disclosure agreements.

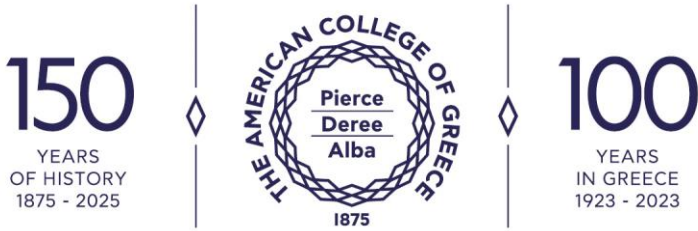
Anyone reporting prohibited conduct under this Policy is advised to ask whether confidentiality can be maintained prior to confiding in an ACG employee.

Confidential Resources (see [6.1. Confidential Resources](#)) at ACG cannot share information without an individual's express consent unless there is imminent risk of serious harm to self or others; or to avert a serious threat to health or safety; or as part of law enforcement activities such as investigations of criminal conduct or of victims of crime, in response to court orders, in emergencies, or as required by law; or in response to a subpoena or a lawful order from a court.

ACG will take reasonable steps to notify anyone reporting prohibited conduct under this Policy about the disclosure of the information confided in an ACG employee or Confidential Resource.

Information about an incident shall be released to a family member or friend who is involved in an individual's care without consent or authorization if the individual is incapacitated or if, in the professional judgment of the ACG employee handling the incident, the release of information is considered to be in the best interests of the Individual.

Confidential consultations about prohibited conduct are available from persons who, by law, have special professional status.



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6.1. Confidential Resources

Apart from the above, confidential resources at ACG are available. On-Campus Confidential Resources are available free of charge to ACG community members impacted by any kind of misconduct under this Policy. Immediate reporting serves the purpose of timely follow-up and ensures that persons affected by the incident are supported appropriately and effectively.

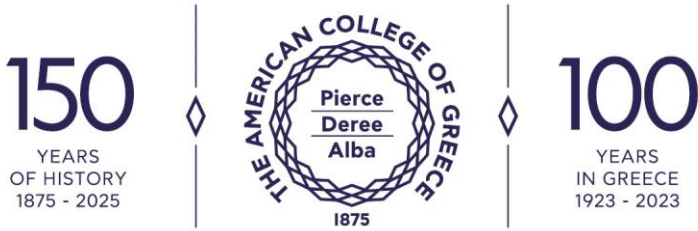
The resources for students are the ACG Counseling Center, providing confidential short-term emotional support, and ongoing individual counseling, and helping students access further off-campus resources and support teams, including hotlines and psychological support/psychiatric care.

The available resources for faculty and staff are the Heads of the ACG Counseling Center, providing professional confidential short-term emotional support to faculty/staff impacted by sexual harassment or other forms of violence, and helping faculty/staff access further off-campus resources and support teams, including hotlines and psychological support/psychiatric care.

Upon referring individuals to Confidential Resources, Responsible Employees are required to also contact the Office of the Dean of Students (in case of student victims) or the Office of the Senior Vice President of Administration and Human Resources (in case of employees, faculty or staff) to report the incidents brought to their attention and inform about the time, date and means of referral to Confidential Resources.

6.2. Responsible Employees

Students must understand the reporting obligation of Responsible Employees (see above in [6. Procedure](#)) before they reveal any information. Responsible Employees are required to report incidents, incl. personally



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identifying details, of prohibited conduct under this Policy involving ACG students or any other community member or third party without delay.

6.3. Offices of the Dean of Students and Senior Vice President of Administration and Human Resources

The Office of the Dean of Students, when the Reporting Party is a student, and the Office of the Senior Vice President of Administration and Human Resources, when the Reporting Party is an employee or third party, are responsible for addressing, in a neutral manner, disclosed incidents of harassment and any form of prohibited conduct under the Policy in the College's programs and activities.

Conversations with the above parties are not deemed confidential. The Office of the Dean of Students and the Office of the Senior Vice President of Administration and Human Resources will handle information provided by persons involved in an incident of prohibited conduct under the Policy with the utmost discretion and sensitivity and are trained to handle sensitive information in accordance with GDPR and ACG policies and procedures. Such information will be shared exclusively on a need-to-know basis.

In rare circumstances, where a community safety concern is substantiated by the information shared, the Office of the Dean of Students, the Office of the Senior Vice President of Administration and Human Resources shall request that an individual take steps to initiate a formal report regarding the incident.

The Office of the Dean of Students and the Office of the Senior Vice President of Administration and Human Resources:

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- Guide persons to whom this Policy applies to available resources on campus and facilitate their access to confidential resources.
- Decide on and help arrange interim measures to safeguard that ACG Community members continue their studies and/or work and participate in campus life.
- Mediate to facilitate informal resolution between the involved parties, as appropriate, with the goal of reaching a mutually acceptable resolution. The outcome of the process will be communicated to the involved parties in writing and recorded on Jenzabar.
- Provide information on this Policy and other applicable ACG policies and procedures.
- Provide information about filing a formal report using the College's reporting system, and options for reporting sexual misconduct, including anonymous reporting.
- Investigate reported misconduct under this Policy. Investigation and hearing processes are proscribed by the Student Code of Conduct and the Employee Handbook respectively.
- Ensure equitable rights of the Reporting Party and the Responding Party during the investigative process. Balancing the standard of preponderance of the evidence with the presumption of innocence principle and due process with respect to the Responding Party is critical for the fairness of the process.
- Collaborate with SART (see below) and external resources as appropriate in cases of sexual assault and rape to advise victims about preservation of physical evidence, forensic exam and HIV prophylaxis (within 72 hours after the incident) at a public hospital, and offer support

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of a SART representative during the forensic exam. Victim consent to a specific individual acting as support person must be explicit and affirmative.

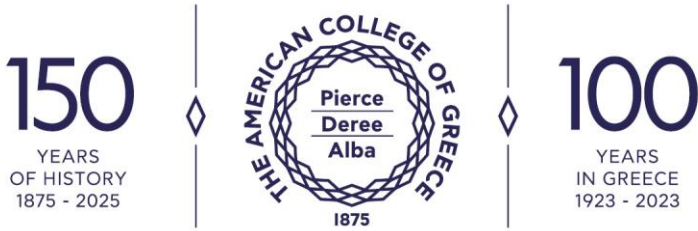
- Ensure immediate physical protection and transportation to a public hospital, if the victim requests a forensic exam and HIV prophylaxis.
- Support persons to whom the Policy applies in seeking medical care and pursuing legal action.

6.4. SART (Sexual Assault Response Team)

SART is an on-campus community-based team trained to provide immediate and confidential response in cases of a sexual assault incident. SART directs victims to campus and external resources, helps navigate and activate the reporting process and access specialized counseling and healthcare professionals. SART meets regularly and ad hoc, in case of reported prohibited conduct, to coordinate institutional response, support the victim and maintain victim-centered and offender-focused approach to case review.

SART is composed of:

- a. Office of the Dean of Students representative;
- b. Office of the Senior Vice President of Administration & Pierce / Human Resources representative;
- c. Campus Security representative;
- d. ACG Health & Wellness Center representatives, incl. a ACG Nurse;
- e. ACG Counseling Center representative;
- f. ACG International Student Services representative (when victim or alleged perpetrator are study abroad/international students);



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- g. ACG Residence Life representative, incl. an RA (when victim or alleged perpetrator are student residents);
- h. Registrar | Dean, Academic Administration

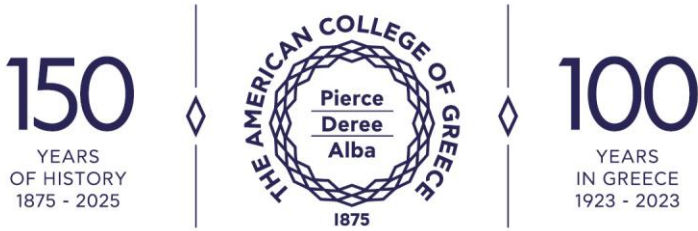
SART meets annually to develop and revise operating guidelines and propose amendments to the Policy, where needed, in view of best practices in Sexual Assault Response.

SART meets on occasion of and in the aftermath of an incident of sexual assault to coordinate and evaluate, respectively, ACG response.

In case of sexual or gender-based harassment, SART members are trained to offer emotional support to victims and to others in their immediate environment. SART members can propose on-campus interim measures to the Office of the Dean of Students or the Office of the Senior Vice President of Administration and Human Resources.

7. CONDUCT PROHIBITED BY LAW

Should conduct prohibited under the Policy be found to also violate the laws of the local jurisdiction, ACG maintains the right to activate internal disciplinary procedures parallel to the legal proceedings, following consultation by the Office of College Legal Affairs and Policy. However, ACG could be required by the authorities to postpone internal procedures until legal proceedings have concluded. Moreover, ACG preserves the right to take interim measures as indicated in following sections, such as no-contact orders or suspension, while police investigation, prosecution or court proceedings are pending.



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ACG, in consultation with the College Legal Affairs and Policy and Campus Security, reserves the right to report incidents of prohibited conduct or incidents of alleged violations of the Policy to the Prosecutor/the local police authorities. In such case, ACG officials handling the incident shall inform the Parties that the violation exceeds the scope of disciplinary action and shall advise the Reporting Party to seek external legal support regarding reporting options to the Prosecutor/the local police authorities.

The Responding Party can be subject to criminal prosecution and to civil liability. Records of internal investigation and proceedings under the Policy can be subpoenaed in cases of criminal prosecution and/or civil litigation.

Standards of protection and appropriate response to prohibited conduct under the Policy are also aligned with the spirit of EU law.³

³ **Relevant EU Law:** Directive 2002/73/EC of the European Parliament and of the Council, amending Council Directive 76/207/EEC on the implementation of the principle of equal treatment for men and women with regards to the access to employment, vocational training and promotion, and working conditions, calling on member states to better protect the rights of victims of sexual harassment and ensure the integrity, dignity and equality of women and men at work; Directive 2006/54/EC of the European Parliament and of the Council on the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation; The Victims' Rights Directive (Directive 2012/29/EU of the European Parliament and of the Council), establishing minimum standards on the rights, support and protection of victims of crime, and defining gender-based violence as a form of discrimination and a violation of the fundamental freedoms of the victim, that includes violence in close relationships and sexual violence (rape, sexual assault and harassment) and recognizes the special support and protection required for women victims of gender-based violence because of the high risk of secondary and repeat victimization, intimidation and retaliation. ACG discloses information about campus crime to local authorities as required by Greek law. ACG has adhered to the General Data Protection Regulation of the E.U. (as of May 2018). Directive (EU) 2019/1937.

8. RESPONSE TO PROHIBITED CONDUCT, RIGHTS AND OBLIGATIONS

Prohibited conduct under this Policy by or against persons to whom it applies is determined upon a thorough investigation process, as described in [13.1. Investigation](#) below.

Upon receiving a report of misconduct, the institution shall provide a notice of the student's or the employee's rights and options under this Policy to the Reporting Party.

Any member of the ACG Community or third party to whom the Policy applies are expected to notify the institution that a protective order has been issued under national law. ACG, upon receipt of such notice, shall take all appropriate measures to fulfil the protective order. They shall also request information and advice and receive assistance from campus authorities in making any such notification and in reporting an incident, accessing professional care or filing a formal report. Any action taken in an effort to help and support the victim of prohibited conduct under this Policy is subject to the victim's consent. ACG shall make every reasonable and appropriate effort to preserve the privacy and protect the confidentiality of persons to whom this Policy applies.

8.1. For students

ACG students have the right to:

- Notify or decline to notify law enforcement, including local police, of an alleged incident of misconduct (see below for the reporting procedure).
- Make a report to the police or the Prosecutor.

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- Have disclosures of prohibited conduct under this Policy treated seriously.
- Make decisions about disclosure of incidents free from pressure by ACG.
- A fair and impartial process.
- Be treated with dignity and receive available health care and counselling services from ACG.
- Describe the incident to as few ACG employees as practicable and not be required to unnecessarily repeat a description of the prohibited conduct.
- Be reasonably protected from retaliation.
- Access first-instance and at least one level of appeal as per the applicable Student Code of Conduct.

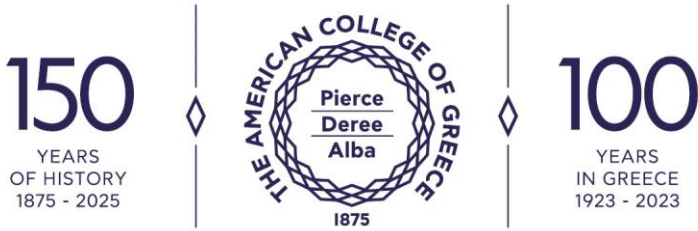
8.2. For employees

ACG Employees are obliged to report incidents involving prohibited conduct under this Policy to the Office of the Senior Vice President of Administration and Human Resources.

8.3. For third parties

Third parties to whom the Policy applies can report incidents involving prohibited conduct under this Policy to Campus Security; regarding the Aghia Paraskevi Campus Main Gate (tel: +302106009800 ext. 1100, email address: security.services@acg.edu), and the Downtown Campus Front Desk (tel: +302108964531, email address: security.services@acg.edu).

With regards to the reported incidents, ACG shall annually, no later than December 1st, prepare a report that includes:



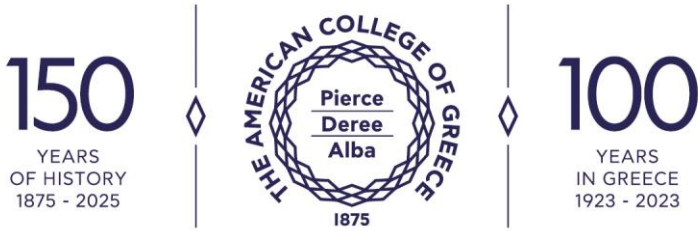
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- the total number of reports of sexual misconduct by any member of the ACG Community;
- the number of reports made by students or employees of the institution against another student or employee of the institution investigated by a local or national law enforcement agency, if known;
- the number of students and employees found responsible for violating this Policy;
- the number of students and employees found not responsible for violating this Policy; and
- the number of disciplinary actions imposed by the institution as a result of a finding of responsibility for violating this Policy.

9. INTERIM MEASURES AND NON-RETALIATION

ACG is committed to ensuring the safety and well-being of the Reporting Party and to taking immediate and interim measures to those ends. Both the Reporting and Responding parties are guaranteed equitable access to appropriate support prior to the decision to launch a formal investigation, for the duration of any investigation, and following its outcome.

Interim measures also aim at prohibiting retaliation against those who file a report, or otherwise take part in the investigation and/or disciplinary process, such as bearing witness. Interim measures for non-retaliation can indicatively include: options for changing academic, living, campus transportation or working arrangements, where such do not impose undue hardship, in response to an alleged incident of misconduct regardless of where the conduct occurred or whether such conduct occurred outside of an



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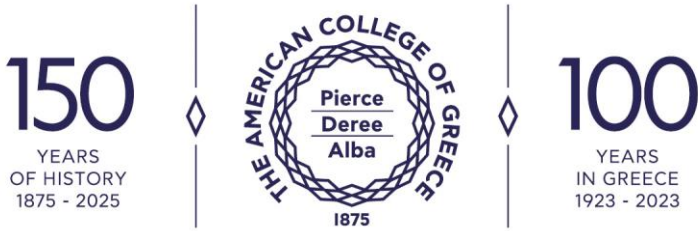
institution's programs or activities, or whether a report is filed in accordance with the institution's Policy for resolving reports.

If there is anonymous reporting or if a victim's request for confidentiality limits the ability of ACG to investigate a reported incident, steps can be taken to restrict the effects of alleged prohibited conduct under this Policy and prevent its recurrence without proceeding with formal action. Protective measures and accommodations in that case include, but are not limited to: increased monitoring, supervision or security at locations or activities where the reported misconduct occurred; awareness-raising, training and education for ACG Community members; memorandum communicating this Policy to the ACG Community; and conducting campus climate surveys regarding sexual misconduct.

10. SANCTIONS

The definitions of prohibited conduct under this Policy provide a clear delineation of the institutional behavioral expectations of all students, as well as faculty, staff and visitors/third parties. Sanctions imposed when these are not followed, as per the Student Code of Conduct, are given by the Office of the Dean of Students. Sanctions can be proposed by the Executive Director of Operations, responsible for the operation of ACG residences, if the violation occurred at the Residence Complex. For the imposition of a sanction, the nature and the severity of the misconduct, the students' conduct history and the harm and damage inflicted will be taken into consideration. Repeated violations or single incidents comprising multiple violations will result in more severe sanctions.

Sanctions include:



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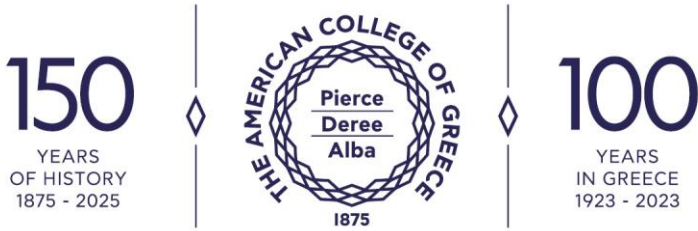
10.1. Reprimand and Written Warning

Verbal reprimands for inappropriate behavior are registered in internal records. Written Warnings, that admonish the students involved in a violation of this Policy, shall notify the student that further misconduct/violation(s) could result in additional conduct proceedings and sanctions. Warnings are registered in internal records.

10.2. Reflective Work

Along with a written warning, students can be asked to complete educational activities intended to involve the student in a positive learning experience related to the student's unacceptable behavior. Educational activities allow students to reflect upon their inappropriate behavior and to understand why their behavior was inappropriate. These can include, but are not limited to:

- a campus service project (hours for restitution will range from 5 to 15 hours, depending on the severity of the offense and the students' conduct history);
- a personal assessment, mediation, or counseling (a student can be required to complete a specified assessment relative to the violation committed and assessment reports shall be submitted to the Office of the Dean of Students and become part of the students' conduct record);
- a reflection paper (student can be asked to write a paper related to the implications of the student's conduct);
- a written apology.



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10.3. Restriction/loss of ACG Privileges

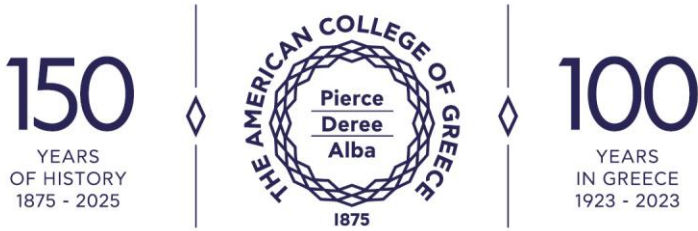
The student can lose the privilege of participating in activities that include, but are not limited to, participation in athletic, musical and theatrical productions, clubs, societies and organizations and other ACG sponsored events for a specified or indefinite period of time and can be denied the use of facilities such as the gym, the pool and the Residence Complex.

10.4. Removal from the Residence Complex

The student can lose the privilege of living at the Residence Complex and parents/guardians (of students who are minors) or the partner institution may be notified accordingly. This sanction is proposed by the Executive Director of Operations, responsible for the operation of ACG residences, and imposed by the Office of the Dean of Students (local students) or the Executive Director, International and North-American Enrollment (study abroad/international students). Note: Students removed from the ACG Housing, regardless of the amount of time remaining in the semester, are not eligible for refunds or rebates associated with housing, tuition or fees.

10.5. Student Conduct Probation

All Disciplinary Sanctions are formally communicated to students through an Admonishment Letter. An Admonishment Letter for student conduct probation explicitly indicates that any further violations, regardless of their severity, may result in immediate suspension or expulsion from ACG. The duration of the student conduct probation, typically, not less than one semester, affects the non-academic status of the student. While on probation, the student cannot hold an elected or appointed office in any student organization, club or society registered with ACG, represent ACG in any extra/co-curricular activity or official function, work at ACG through the Work



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Study program, or apply for a position in the International Internship and Study Abroad Program. Any student placed on conduct probation can lose scholarships (e.g. academic scholarship or other merit-based institutional gift aid).

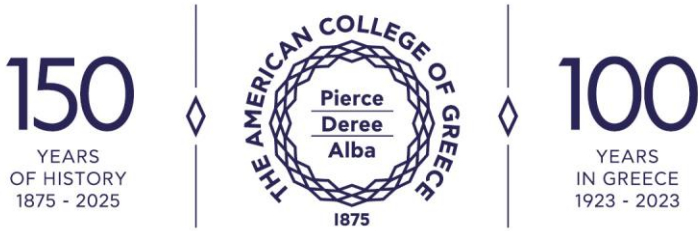
Regarding students on placement through ACG or students who participate in internship programs, employers may be notified of the student's disciplinary status by the Office of the Dean of Students. With regard to the Study Abroad Students, sending institutions of study abroad students may be notified about student misconduct by the Executive Director, International and North American Enrollment. Depending on the severity and the type of the incident of misconduct and the circumstances, ACG, in consultation with the sending institution, shall jointly decide on the potential consequences, which may vary and include: non-participation in student's life for the duration of the study abroad program, namely trips, athletic activities etc, with the most severe being the return to the home institution.

10.6. No-Contact Order

It should be obtained as a court-issued protective order or an institution-issued no-contact order against an alleged perpetrator of the sexual misconduct.

10.7. Temporary Suspension

The student is suspended from taking classes, using ACG facilities and taking part in any ACG event, pending conduct proceedings, for a specified period of time at the discretion of the Office of the Dean of Students where it is believed the student would constitute serious disruption or danger to the



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health, safety or welfare of ACG, others or oneself. Temporary suspension will remain pending until the completion of the conduct process.

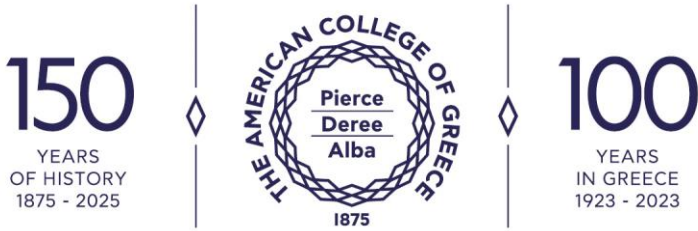
10.8. Suspension

The student is suspended from taking classes and/or living in the Residence Complex for a specified or indefinite period of time. The student must comply with all sanctions prior to readmission. Note: Students suspended from ACG, regardless of the amount of time remaining in the semester, are not eligible for refunds or rebates for charges associated with housing, tuition or fees.

10.9. Expulsion

The student is permanently expelled and cannot be readmitted to ACG. Note: Students expelled from ACG, regardless of the amount of time remaining in the semester, are not eligible for refunds or rebates for charges associated with housing, tuition, or fees.

Subject to relevant legislation, and especially laws regarding child protection, ACG respects and protects the confidentiality of student records. In extraordinary circumstances such as serious injury to a student, a violent crime committed by or upon a student, serious concerns or threats to a student's physical or emotional health and other sufficiently grave incidents relevant to prohibited conduct under this Policy, which cannot be exhaustively enumerated or described in the nature of things, ACG maintains the right to notify parents or guardians of students who are minors or students who have explicitly consented to parental notification upon admission. ACG, committed to the student's best interest, in special circumstances, will discuss the matter with the student to assess whether such notification is undesirable or inappropriate.



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The Office of the Dean of Students or the Executive Director, International and North America Enrollment and Student Services, in case of incidents involving study abroad/international students, can send a notification or a copy of the student's Admonishment Letter to the address on file for parents/guardians of students.

Whenever possible, a conversation in person will be held with both the student and the student's parent or legal guardian.

Home/Sending institutions of study abroad/international students can be notified about student misconduct by the Executive Director, International and North America Enrollment and Student Services.

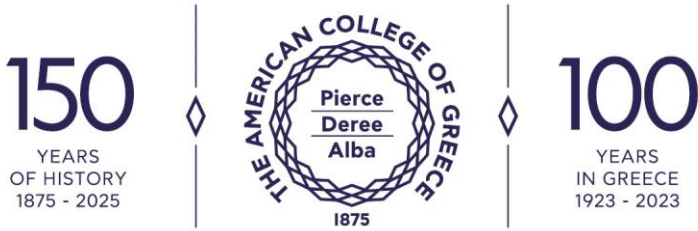
Records of all sanctions imposed will be retained in the Student File at the Office of the Registrars and a file will be created for students involved in incidents at the Office of Student Affairs.

ACG officials including, but not limited to, Academic Deans, Advisors, Department Heads, Coaches can be informed of the sanctions imposed.

Failure to comply with sanctions as directed can result in additional disciplinary sanctions including suspension or expulsion from ACG.

11. POSSIBLE SANCTIONS FOR ACG EMPLOYEES IN VIOLATION OF THIS POLICY

- If the report is unsubstantiated, no action is taken.
- If the report is partially substantiated, or if minor claims are fully substantiated, sanctions can include, but are not limited to, a formal letter of apology, mentoring, counseling or continuing education, or a period of probation.



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- If the report is fully substantiated, or if major claims are partially or fully substantiated, sanctions can include, but are not limited to, a formal letter of apology, mentoring, counseling or continuing education, a period of probation, suspension or removal. For suspension or removal, the internal ACG Committee convenes in the presence of the College's legal advisors. All sanctions and procedures are subject to the Greek Law nr. 4808/2021 regarding combating violence and harassment at the workplace.

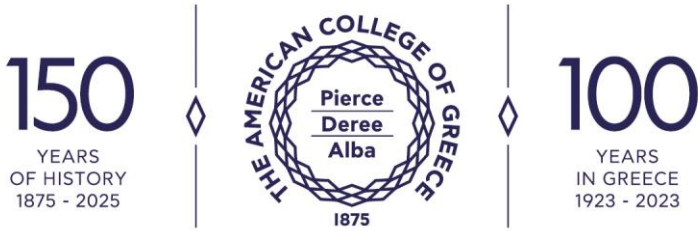
12. **REPORTING PROCESS**

Annually, not later than the second week of September, institution shall transmit to students and employees by electronic mail their policies and procedures concerning the report and investigation of an allegation of misconduct under this Policy of a student or employee of the institution towards another student of the institution.

Students, faculty and staff are expected to actively address reports and concerns, including concerns about faculty conduct, as an integral part of the educational process.

Students who have disclosed a concern (e.g. to a Responsible Employee) will be invited by the Office of the Dean of Students to attend a first, informal meeting to discuss and clarify their concerns. In this initial meeting, students are guided through reporting processes and hearing options:

- informal reporting, hearing and resolution, if applicable in light of the relevant Greek law and taking into account the gravity of the reported incident;



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- formal reporting and hearing processes;
- anonymous reporting.

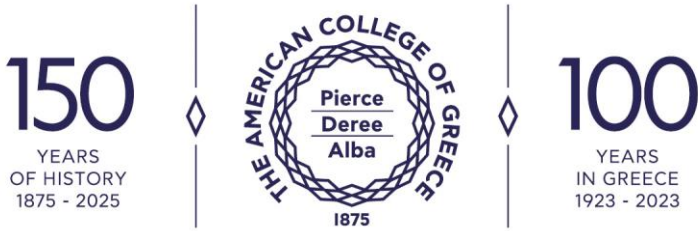
Accordingly, a written record of the informal meeting and the selected course of action will be made and stored in a confidential folder which is held electronically by the Office of the Dean of Students.

In enforcing this Policy, however, particularly on occasion of incidents of sexual misconduct, specific deviations from usual procedures can apply:

- Mediation is rarely appropriate.
- The standard of preponderance of the evidence must be balanced with the presumption of innocence principle and due process with respect to the Responding Party. There is a presumption that the Responding Party is not responsible for the alleged conduct until a determination regarding responsibility is made by the institution at the conclusion of the relevant process.
- Internal investigation of a reported incident of prohibited conduct under the Policy must include trained individuals. ACG will consult internal and external experts, where necessary in the process, and involve them in the decision on appropriate sanctions.

Internal disciplinary procedures result in the following findings:

- The report is unsubstantiated, meaning allegations are found to be without merit based upon facts.
- The report is partially substantiated.
- The report is fully substantiated.

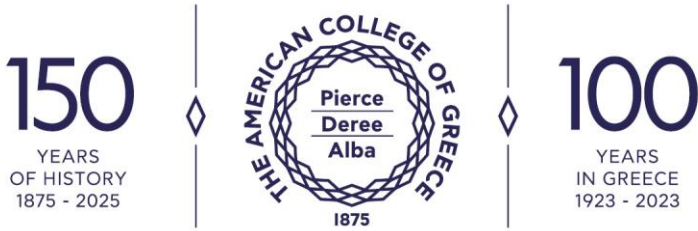


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ACG is committed to supporting students regardless of whether a formal or an informal report is made.

12.1. Filing of an informal report

An informal hearing process is an attempt to resolve the Reporting Party's concerns with process and outcome remaining confidential. If either party objects to an informal hearing, the matter is automatically referred to a formal hearing process as per the respectively applicable internal ACG Policy and Procedures (Student Code of Conduct, Faculty Code of Conduct, ACG Employee Handbook). In the informal hearing process involving students, the responsible office is the Office of the Dean of Students, while when involving faculty members, the responsible office is the Office of the Senior Vice President of Administration and Human Resources. The report of the incident shall take place orally or in writing to the dedicated email address incident@acg.edu and/or telephone number +302106009800 ext. 1197 with the clarification that this [email] constitutes an informal report. A first meeting with the reporting party shall take place within five (5) business days of the reporting date, in which the reporting party is notified of the College's available resources, the possibility of submission of a formal report, and is also asked about the possibility to involve the responding party in the process. Additional steps such as direct discussions with both parties, individually and collectively, can also be taken as deemed necessary by the Office of the Dean of Students and the Office of the Senior Vice President of Administration and Human Resources to facilitate mutual understanding and effectively address and resolve the issue. A summary of the informal hearing process, covered by confidentiality as appropriate, is inserted in Jenzabar. In the case of risk of



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serious harm to self or others, ACG reserves the right to take interim measures for the protection of the parties.

12.2. Filing of a formal report

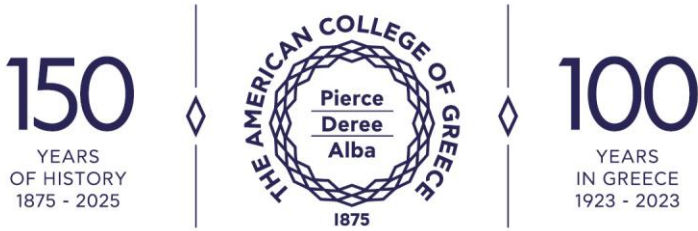
The filing of a formal report regarding an incident of misconduct relating to students takes place via email at incident@acg.edu or via the submission of an [Incident Report Form](#) to the Office of the Dean of Students. The Office of the Senior Vice President of Administration and Human Resources is also notified in the case that the incident refers to an ACG employee. Employees must contact directly the Office of the Senior Vice President of Administration and Human Resources via hr@acg.edu. The behavior/incident must constitute an alleged violation of the Faculty Code of Conduct and/or the ACG Employee Handbook in spirit or letter and must cause significant distress and/or harm to the Reporting Party or to the integrity and reputation of ACG, or both.

To protect the Reporting Party from the pressure to withdraw the report, the report may not be withdrawn until the conclusion of the formal hearing process.

The procedure that follows the filing of a formal report is described in [13. Investigation, Notification, Hearing and Appeals Processes](#) below.

The formal hearing process can result in:

- Sanctions;
- Accommodations for the Reporting Party/victim and/or
- Additional remedies and measures for the ACG community.



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12.3. Anonymous reporting

Students can report an incident of misconduct anonymously by By mailing/dropping off an anonymous report ([Pdf available on the website](#)) to the Office of the Dean of Students, Deree The American College of Greece, Gravias 6, Aghia Paraskevi, 15342. Anonymous reporting occurs when the name or identity of the Reporting Party or witness is not disclosed, nor that of other parties involved. No action by ACG is requested. Action by ACG shall depend on the nature of the information shared. The privacy of individuals reporting prohibited conduct or mentioned in reports shall be protected to the extent permitted by law and this Policy. Individuals who are survivors/victims of crime or witnesses of prohibited conduct have the right to request protection and confidentiality regarding their name or identity. Information conveyed through anonymous reporting assists ACG and the police to track patterns of prohibited conduct.

13. INVESTIGATION, NOTIFICATION, HEARING AND APPEALS PROCESSES

A Reporting Party or a witness, who causes an investigation about an incident of alleged misconduct, shall not be subject to a disciplinary sanction for a violation of the Deree Student Code of Conduct or the ACG Employee Handbook related to the incident unless the institution determines that the report was not made in good faith or that the violation was egregious. An egregious violation is defined as an action that, among others, places the health and safety of another person at risk.

13.1. Investigation

The principles below shall be followed until the case is resolved;

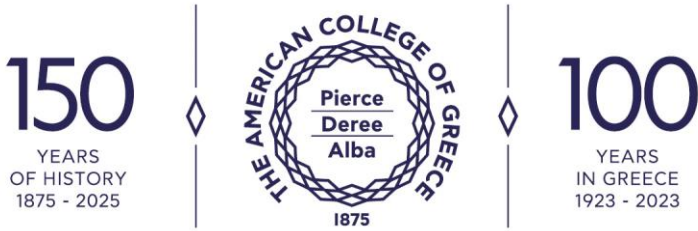
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- The Office of the Dean of Students must be involved in all stages of the hearing process, if students are involved in the incident.
- Administrators responsible for processing reports are expected to use specified fields on the Incident Report Form to facilitate investigation.
- Appeals to decisions/sanctions under the jurisdiction of the Office of the Dean of Students are directed to the Office of the Senior Vice President of Administration and Human Resources.

Violations are determined based on all the available facts and circumstances, including statements of the Reporting Party, the Responding Party and any witnesses to the alleged violation, as well as information about pre- and post-incident conduct that can be associated with the incident. Enforcement of the Policy can take place parallel to law enforcement. Internal investigation of incidents involving conduct prohibited by the Policy can be conducted parallel to police investigation, prosecution or court proceedings. During the investigation process, both Parties shall be provided with equal opportunities to inspect and review evidence that is directly related to the allegations.

13.2. Notification

The Responding Party will receive notification within five (5) working days since the report of the incident, regarding the date, time and location, if known, of the alleged incident of misconduct and a specific statement concerning the policies that were violated, and, also, the actions, which resulted in this violation. The Responding and the Reporting Party shall also receive a copy of the ACG policies regarding the submission and consideration of evidence, that can be used during a hearing or disciplinary proceeding and shall have the opportunity to present evidence and witnesses on their behalf



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during a hearing or disciplinary proceeding. However, each Party shall be provided with timely and equal access to relevant evidence useful for the determination of a disciplinary action.

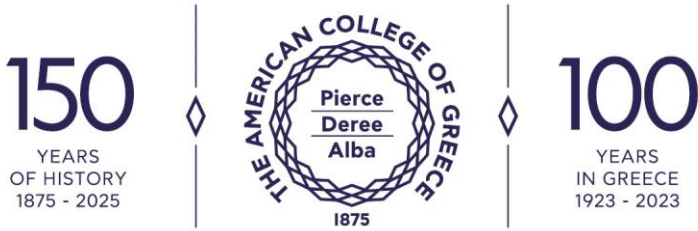
During that time, the ACG administration, namely the Offices responsible for the hearing process as per the ACG community members involved in the case, will conduct relevant investigation, as per the Student Code of Conduct and the ACG Employee Handbook. The student can be asked to visit the Office of Student Affairs to discuss the incident and will be advised regarding the next steps.

ACG shall notify students and employees of the institution's obligations under national law to: (i) investigate or address the alleged misconduct, including when the alleged act was reported anonymously; (ii) assess whether the report triggers the need for a timely warning or emergency notification under national regulations, the obligations of which can, in limited circumstances, result in the release of the Reporting Party's identity; and (iii) disclose the identity of a Reporting Party to another student, an employee or a third party.

13.3. Hearing Process

It is crucial that ACG shall not disclose the identity of the Reporting and the Responding Party, except as necessary to carry out a disciplinary process or as permitted under national law.

It is at the discretion of ACG to form *ad hoc* Disciplinary Committees at first instance and appeal levels to address incidents involving different ACG Community member types, that is, students and faculty or staff. Nonetheless, when the Responding Party is a student, incidents of misconduct shall be referred to a Hearing Board in accordance with the relevant provisions in the



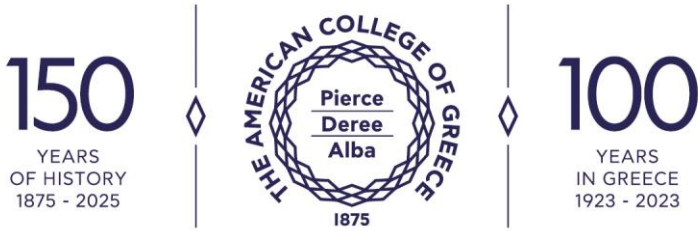
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Student Code of Conduct. The student has the right to request to reschedule the Hearing Board once, within two (2) working days from the date of notification. If the student does not engage with this process, the proceedings will continue in absentia, and sanctions will be issued accordingly. The student also gives up their right to an appeal. Students have the right to review and comment on the documentation of the case, present evidence on their behalf, and call witnesses. However, there can be restrictions on evidence considered by the fact finder, including but not limited to, evidence of prior sexual activity or character witnesses. Students will be asked whether they take responsibility for their actions. The Reporting Party and the Responding Party shall not be permitted to directly question each other during the hearing process. Within five (5) working days, the Office of the Dean of Students will make a final decision based on the facts of the case and the outcome of the Hearing Board, determining whether to hold the student responsible for the alleged violation and issuing sanctions accordingly, and notify the Parties within seven (7) business days. The Parties shall also be informed of any process for appealing the decision.

13.4. Appeals Process

Appeals are not re-hearings and will not be granted based solely on a student's disagreement with the outcome or the severity of the sanctions. The Office of the Dean of Students will review all requests for an appeal to verify that appropriate grounds for filing an appeal are followed. All imposed disciplinary sanctions remain in place pending the outcome of the appeal.

A student must submit their appeal in writing to the Dean of Students' Office within five (5) days after receiving the written notification of the



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decision. The appeal must include a statement supporting the grounds for the appeal and all relevant supporting information.

The grounds for an appeal must be based upon at least one of the following:

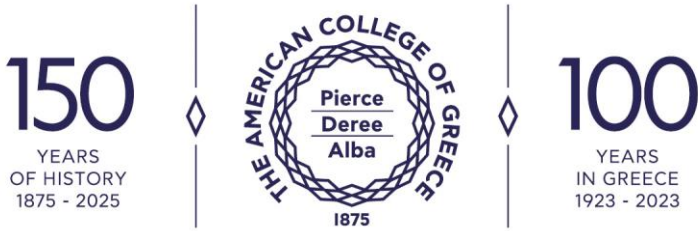
- Procedural Error: A procedural error(s) occurred during the conduct process that significantly impacted the outcome.
- New Information: Information unavailable at the time of the conduct meeting, that if introduced would have significantly affected the outcome of the conduct meeting.

A detailed account of the new information must be clearly specified. Information that was voluntarily withheld during the original meeting will not be considered new information.

The written appeal statement and all relevant supporting information and documentation is submitted to the Appeals Officer.

If the Appeals Officer determines that the new information may have significantly affected the outcome of the original hearing, then the original hearing body will reconvene to consider the new information. This is not a re-hearing but an opportunity for the new information to be presented by the appealing party.

When there is an appeal on the grounds of procedural error, the Appeals Officer will determine if the procedural error occurred, and if so if that procedural error would have significantly impacted the outcome. If so, ACG will decide if the error can be corrected and remanded back to the original hearing body, or if a new hearing is needed.



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All documentation is reviewed, and a decision is made within ten (10) days of the process being initiated.

The decision of the Appeals Officer regarding the appeal is final and binding.

14. GUIDELINES FOR FIRST RESPONSE TO A VICTIM OF MISCONDUCT

14.1. General Guidelines:

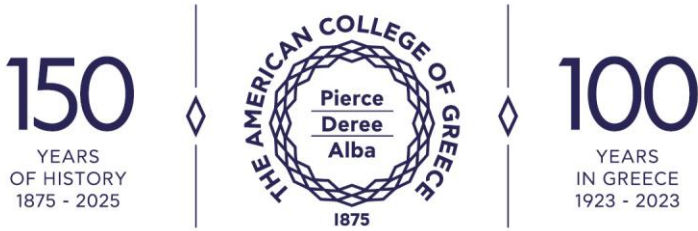
- Opt for a personalized approach and in-person communication with victims to respond immediately to emotional reactions and guide them promptly to support services. If in-person communication is not possible, phone calls offer an alternative for immediate response to questions, needs, and building rapport with victims. Written communication, including text messaging, should only be used as a last resort due to potential interception. Always respect victims' safety and confidentiality, and ask for their preference regarding continued contact.
- Provide written resource materials such as flowcharts in both English and Greek, along with Know The Facts brochures. Additionally, offer clear guidance to victims on immediate steps, available on-campus and external support services, and contact information for key external medical and legal resources.

14.2. Helpful Language for Responsible Employees;

- Be supportive and patient
- Listen and validate feelings shared by the student/colleague/third party
- Refrain from pressing the student/colleague/third party to give details

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- Explain clearly and before the student/colleague/third party discloses details about prohibited conduct that, as a Responsible Employee, you are obliged to report
- Provide guidance regarding reporting options and Confidential Resources as per this Policy
- Give time and space to the student/colleague/third party to decide on course of action
- Avoid asking "Why" and sharing own opinion about the events and the persons involved
- Responsible Employees are expected to say: "I can help you connect with support on campus services, such as the ACG Health & Wellness Center or Campus Security, or guide you to external resources. But first, I want you to know that I am a Responsible Employee, which means that I must share with the Office of the Dean of Students/Senior Vice President of Administration and Human Resources any information disclosed to me about discrimination, gender-based discrimination, sexual misconduct, harassment or assault, relationship/dating violence, stalking. I want you to be able to make an informed choice about what you share with me. I can also connect you to the ACG Counseling Center, which is the ACG on-campus confidential resource."
- You can say: "Thank you for sharing...", "Thank you for trusting me...", "I regret this has happened to you", "What can I do to help?"
- Responsible employees should be aware that male and LGBTQI+ victims sometimes are found to be less likely to report an incident or want a medical exam and should be made aware to them that they have the



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right to request a male/female or LGBTQIA+ healthcare provider when reporting or disclosing details or undergoing a medical exam.

15. TRAINING AND AWARENESS-RAISING

ACG shall provide to newly-enrolled students (including international students) and newly-hired employees mandatory sexual misconduct primary prevention and awareness programming for newly-enrolled students and newly-hired employees. These that shall indicatively include:

- an explanation of civil rights laws, their meaning, purpose, definition and applicability to all forms of sex-based and gender-based harm;
- the role drugs and alcohol play in affecting consent;
- options relating to the reporting of an incident of sexual misconduct, the effects of each option and the methods to report an incident of sexual misconduct, including confidential and anonymous disclosure;
- information on the institution's policies and procedures for resolving sexual misconduct reports and the range of sanctions or penalties the institution can impose on students and employees found responsible for a violation;
- contact details and role of the confidential resource provider; and
- strategies for bystander intervention and risk reduction; information on opportunities for ongoing sexual misconduct prevention and awareness campaigns and programming.

Individuals involved in addressing reports of harassment or misconduct must be trained in handling reports and conducting disciplinary processes impartially. Training topics shall include:

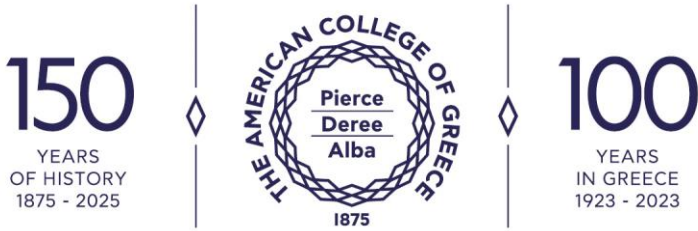
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- interviewing individuals subjected to sexual misconduct and understanding specific types of misconduct.
- consent and the role drugs and alcohol can play in an individual's ability to consent;
- the effects of trauma, including any neurobiological impact on an individual;
- cultural competence, particularly regarding diverse backgrounds such as national origin, sex, ethnicity, religion, gender identity, and sexual orientation;
- sensitively communicating with reporting parties, providing services, and assisting individuals with developmental or intellectual disabilities and
- principles of due process to ensure fairness for all parties.

The prevention, emergency response, and victim support programs include:

- Guidelines for preserving evidence and reporting incidents to local authorities.
- Support for victims, including information on campus and external care resources.

New students, including international and study-abroad students, receive training during Orientation Week through programs tailored to their needs, such as cultural awareness and body space perception workshops. Awareness campaigns, co-curricular programs, and online resources are disseminated via posters, newsletters, and student organizations to reinforce ACG's commitment to preventing harassment and misconduct.



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Ongoing training for employees occurs each fall and spring semester, including annual high-level meetings for senior leadership and the Sexual Assault Response Team (SART). These initiatives aim to prevent incidents, encourage reporting, and ensure impartial investigations. Training topics include consent, trauma, supporting marginalized populations, self-care for responders, collaboration with prosecutors, and specialized training for ACG Nurses.

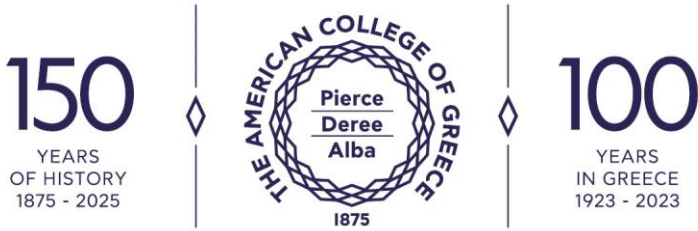
16. REVIEWING PERIODS

ACG reviews the Policy **every two years** to ensure its compliance with best practices and current professional standards. ACG establishes procedures for regularly reviewing and updating the organization's policies.

17. CLIMATE SURVEYS

ACG is required to conduct sexual misconduct climate surveys at least once every four years. These sexual misconduct climate surveys shall gather information on topics including, but not limited to:

- the number of reported and unreported incidents of sexual misconduct at the institution;
- when and where incidents of sexual misconduct occurred;
- student awareness of institutional policies and procedures related to campus sexual misconduct;
- whether a student reported the sexual misconduct and, if so, to which campus resource the report was made;
- whether a student was informed of or referred to local, state, campus or other resources or victim support services, including appropriate medical care and legal services;



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- whether a student was provided with information about resources for protection from retaliation, access to school-based supportive measures and civil/criminal justice remedies;
- contextual factors, such as whether the incident of sexual misconduct involved force, incapacitation or coercion;
- demographic information that could be used to identify at-risk groups; and perceptions of campus safety among members of the campus community and confidence in the institution's ability to protect against and to respond to incidents of sexual misconduct.