



STATEMENT OF NONDISCRIMINATION, NON-HARASSMENT AND NONRETALIATION

(Non-Title IX)

Revision Date: August 2025

Purpose:

Dorsey College and Dorsey School of Beauty (the “Institutions” or “Dorsey”, or separately the “Institution”) are committed to maintaining an environment that is free from unlawful discrimination, harassment and retaliation, including sexual discrimination, sexual and gender-based harassment and violence, relationship violence, stalking and retaliation. Dorsey does not discriminate on the basis of sex – or any other protected category – in matters of education, extracurricular activities, programs, activities, admissions, services, financial aid, or in the context of employment (collectively, the “programs and employment”). Harassment, including sexual harassment, denies or limits a person’s ability to participate in or benefit from the Institution’s programs and employment and can be forms of prohibited discrimination.

This policy defines harassment, discrimination and retaliation – including sexual misconduct – that is prohibited by the Institution and provides the campus community with the process for handling reports of harassment, discrimination, retaliation and sexual misconduct that do not fall under Dorsey’s Title IX Sexual Harassment Policy.

Scope:

This policy applies to all Dorsey programs and activities involving reported and actual conduct by a respondent who is a student, faculty, staff, or a non-Dorsey-affiliated party. In the event the respondent is a third party or other non-Dorsey-affiliated party, the Institution will take appropriate corrective action and determine the appropriate manner of response consistent with the goals of this policy.

Policy:

I. SEXUAL MISCONDUCT

This Policy applies to Sexual Misconduct that includes sex-based discrimination and harassment that does not fall within the definition of Title IX Sexual Harassment. The Institution’s handling of reports or complaints of Sexual Misconduct meeting this criteria will follow the procedures set forth herein. Sexual

Misconduct as used in this policy includes “Non-Title IX Sexual Harassment” and “Sex Discrimination” as defined below.

Non-Title IX Sexual Harassment

Non-Title IX sexual harassment (“sexual harassment”) is unwelcome communication or conduct of a sexual nature, including unwelcome sexual advances, requests for sexual favors and other verbal, written or physical conduct of a sexual nature, without regard to whether the parties are of the same or different genders or gender identities. It includes, but is not limited to:

- a. Quid Pro Quo Sexual Harassment, Hostile Environment Sexual Harassment, Sexual Assault, Domestic Violence, Dating Violence, or Stalking, that occurs outside of the Institution’s Education Programs or Activities or outside the United States;
- b. Unwelcome conduct that does not rise to the level of Hostile Environment Sexual Harassment, as defined in this Policy, but that:
 - is sufficiently serious (severe, pervasive, or persistent) and objectively offensive so as to deny or limit a person's ability to participate in or benefit from the Institution’s programs, services, opportunities, or activities; or
 - that has the purpose or effect of unreasonably interfering with an individual's work or academic performance.

Sex Discrimination

- a. Sex Discrimination means material, adverse treatment of a person or group on the basis of sex. Discrimination occurs when persons are excluded from participation in, or denied the benefits of, any Institution program or activity on the basis of a protected status.
- b. Pregnancy discrimination is a type of Sex Discrimination and means treating a woman unfavorably because of pregnancy, childbirth, or a medical condition related to pregnancy or childbirth.

The Institution’s process for resolving reports of sexual misconduct will be prompt and equitable and conducted with the oversight of the Title IX Coordinator. If the Title IX Coordinator decides a formal investigation and resolution process is warranted, even if no formal complaint has been filed by a Complainant, the process shall be as follows.

II. OTHER PROHIBITED DISCRIMINATION, HARASSMENT AND RETALIATION

Dorsey does not discriminate, nor permit discrimination by any member of the Institution community, and prohibits unlawful discrimination, harassment, and retaliation including on the basis of race, color, national origin, age, sex, sexual orientation, gender identity, gender expression, pregnancy, religion, disability, veteran status, genetic information, height, weight, familial status, marital status, and other status protected under applicable law (collectively, “protected categories”) in Institution admissions, employment, access, activities, treatment, educational programs, services and all other areas where it is prohibited by law.

III. NON-RETALIATION

Dorsey also prohibits retaliation, including retaliation for making a report, for participating in an investigation, or for otherwise engaging in lawfully protected activity. All members of the campus community are able to make reports and discuss concerns free from retaliation.

IV. REPORTING

All concerns and/or reports of potential instances of conduct prohibited by this Policy – including unlawful discrimination, harassment, and/or retaliation involving students, should be made to grievance@dorsey.edu.

Concerns and/or reports of unlawful discrimination, harassment, and/or retaliation involving employment should be made to the Human Resources Department.

In all instances, reports should be made as soon as reasonably practicable.

V. RESPONSE FOLLOWING A REPORT

When the Institution receives a report of conduct covered by this Policy, it will evaluate the information received and formulate an appropriate responsive plan. This can include gathering additional information to make an initial assessment and/or conducting an investigation into the report. Some instances may be resolved through informal means, while others may be resolved through an investigation, depending on the circumstances of each particular situation.

Investigations will be conducted in a thorough and impartial manner by a qualified investigator designated by the Institution. All parties, witnesses, and individuals are expected to provide full and truthful information during the investigative process. Knowingly providing false or misleading information is a violation of Institution policy and can subject a student or employee to disciplinary action. The investigator or designee will also provide updates, as appropriate, about the timing and the status of the investigation. Parties to an investigation will have an equal opportunity to provide information, to be heard, to submit information, and to identify witnesses who may have relevant information.

If, after an investigation, the Institution determines prohibited conduct has occurred by using a preponderance of the evidence standard, the individual(s) responsible for such conduct will be informed of the same in writing. The Institution will also include the corresponding appropriate sanction(s) for the confirmed misconduct, up to and including dismissal from the Institution.

VII. APPEAL PROCESS

Appeals to the outcome of the investigation must be submitted within seven (7) days of the appealing party receiving the outcome of the investigation. Appeals must be submitted in writing to the Title IX Coordinator, or designee, and set forth the basis and grounds for the appeal which may only be one or more of the following:

- a. There was a material deviation from the procedures set forth in this policy that would significantly impact the outcome of the matter or that may reasonably have resulted in a different finding;
- b. The sanction is disproportionate to the violation;
- c. New or relevant information, not available at the time of the investigation or determination, has arisen that would significantly impact the outcome of the matter;
- d. A conflict of interest or bias on the part of the investigator improperly influenced the outcome.

Dissatisfaction with the outcome of an investigation is not grounds for appeal in and of itself. The Institution's decision on an appeal is final and not subject to additional or further appeals.

VIII. QUESTIONS

Questions regarding this policy should be directed to the Institution's Title IX Coordinator.