

# **International House Non-Discrimination Policy**

#### I. Statement of Policy

International House ("I-House") is committed to equal treatment and opportunity for its Resident Members; to maintaining an environment that is free of bias, prejudice, discrimination, harassment, and retaliation; and to establishing complaint procedures for allegations involving Resident Members.

## II. To Whom This Policy Applies

This policy applies to all Resident Members of I-House and applies regardless of whether the alleged wrongdoer is a Resident Member.

## III. Scope of Policy

This policy demonstrates I-House's strong commitment to prevent discrimination and harassment against Resident Members on the bases of several protected characteristics as set forth below. This policy applies regardless of whether the alleged wrongdoer is a Resident Member. This policy applies when the conduct occurs on I-House premises, in the context of an I-House program or activity, or the conduct occurs outside the context of an I-house program or activity but (i) has continuing adverse effects on I-House premises or in any I-House program or activity or (ii) occurs in close proximity to I-House premises and is connected to violative conduct on I-House premises.

I-House is a community where the means of seeking to establish truth are open discussion and free discourse. It thrives on debate and dissent, which must be protected as a matter of academic freedom. I-house also recognizes that a critically engaged, activist Resident Member body contributes to I-House's mission. Free inquiry, free expression, and free association enhances intellectual freedom and engagement. I-House interprets this policy in light of such principles and related policies and procedures.

When conduct may involve more than one policy, I-House will determine which policy or policies shall govern the handling of a potential violation, based on the circumstances of the allegation and the terms of any other policy. Specifically, allegations of acts of sexual assault, sexual exploitation, relationship violence, and stalking, committed against Resident Members are governed by the International House Sexual Misconduct, Relationship Violence, and Stalking Policy (the "Sexual Misconduct Policy"). Allegations of sexual or gender-based harassment committed against Resident Members that meet the Sexual Misconduct Policy's definition of sexual harassment are also governed by that policy (e.g., quid pro quo harassment by an I-House employee and severe, pervasive, and objectively offensive unwelcome sexual conduct). Allegations of sexual or gender-based harassment committed against Resident Members that do not fall within the threshold definition of sexual harassment under the Sexual Misconduct Policy as determined by I-House are addressed under this policy. Questions about which policy applies should be directed to the Vice President of Programs & Resident Life.

#### IV. <u>DEFINITIONS</u>

a. **Prohibited discrimination** is adverse treatment of any Resident Member based on actual or perceived race, sex, gender and/or gender identity or expression, color, religion, creed, age, national origin, ethnicity, shared ancestry or ethnic characteristic, disability, veteran or military status, sexual orientation, marital status, pregnancy, citizenship status, or genetic information rather than on the basis of the Resident

Member's individual merit. **Prohibited discrimination** also includes any conduct that constitutes illegal discrimination under the law of the jurisdiction in which the conduct occurs.

- b. **Prohibited harassment** is unwelcome verbal or physical conduct based on actual or perceived race, sex (including unwelcome verbal or physical conduct of a sexual nature), gender and/or gender identity or expression, color, religion, creed, age, national origin, ethnicity, shared ancestry or ethnic characteristic, disability, veteran or military status, sexual orientation, marital status, pregnancy, citizenship status, or genetic information that, from the viewpoint of a reasonable person under all the relevant circumstances, would create an intimidating, hostile, or offensive environment or otherwise adversely affect the individual's opportunities or participation in an I-House program, activity, or benefit. **Prohibited harassment** also includes any conduct that constitutes illegal discrimination under the law of the jurisdiction in which the conduct occurs.
- c. **Examples** of actions that can constitute prohibited discrimination or harassment include, but are not limited to:
  - Repeated verbal abuse or use of racist, sexist, homophobic, or hostile behavior, which
    could include insulting, teasing, mocking, degrading, or ridiculing another person or
    group regardless of whether the person is actually a member of the group;
  - 2. Denying access to or refusing to allow an individual to participate in any program or activity or service of I-House, including, for example, refusing to grant a Resident Member some expected benefit (e.g., such as a letter of recommendation) because of how an individual looks (e.g., because the individual has or lacks stereotypical physical features of a certain ethnic group or conforms or fails to conform to gender stereotypes), dresses (e.g., because the individual wears religious or ethnic attire such as a kippah, Star of David, turban, or hijab or burka), or on the basis of the individual's language (e.g., because the individual speaks a particular language or English with a certain accent), or on the basis of the individual's actual or perceived religious identity, or the individual's actual or perceived association with a religious organization or religious Resident Member club, or because that Resident Member is actually or perceived to be from a particular country or region;
  - 3. Defacing an individual's property with hateful symbols such as a swastika or noose;
  - 4. Discrimination based on the country, world region, or place where a person or their ancestors come from or are perceived to come from, or due to a person's English proficiency. Prohibited conduct includes discrimination based on certain perceptions of, which may be described as hatred toward, religious, and ethnic groups, such as Jewish, Muslim, Hindu, Sikh, Arab, Hispanic, or Latinx Resident Members. For example, anti-Semitism, which is a certain perception of Jews that may be expressed as hatred toward Jews, includes certain rhetorical and physical manifestations directed toward Jewish or non-Jewish individuals and/or their property, toward Jewish community institutions, and toward religious facilities, is prohibited;
  - 5. Inappropriate physical contact, comments, questions, advances, jokes, epithets, or demands based on one or more protected or perceived protected characteristics;
  - 6. Physical assault, intimidation, or stalking on the basis of one or more protected or perceived protected characteristics; or
  - 7. Displays or electronic transmission of derogatory, demeaning, or hostile materials related to one or more protected or perceived protected characteristics.
- d. **Retaliation** means any adverse action taken against an individual for making a good faith report of a violation of this policy or participating in any investigation or proceeding under this policy. Retaliation includes threatening, intimidating, harassing or any other conduct that would discourage a reasonable person from engaging in activity protected

under this policy.

#### V. COMMITMENT TO EQUAL TREATMENT AND OPPORTUNITY

I-House is committed to equal treatment and opportunity for its Resident Members and the entire I-House community and to maintaining an environment that is free of bias, prejudice, discrimination, and harassment. Prohibited discrimination, prohibited harassment, and retaliation undermine the character and purpose of I-House and may violate the law. They will not be tolerated.

#### VI. <u>RESPONSIBILITIES TO REPORT</u>

I-House strongly encourages all members of I-House community who have been victims of prohibited discrimination, prohibited harassment, or retaliation to report the conduct. In the case of incidents of prohibited discrimination and prohibited harassment alleged to have been committed against Resident Members, the Resident Member complainant or other reporting party may make a report to any of the following in writing or in person:

- The Vice President for Programs & Resident Life
- The Director of Public Safety
- The Vice President for People and Culture, or
- An <u>online complaint</u> form

Any complaint should, to the extent possible, identify the parties involved; describe the alleged prohibited discrimination or prohibited harassment behavior; state when and where it occurred; and identify by name or description any witnesses.

Although there is no time limit to file a complaint with I-House, I-House encourages prompt reporting so that an investigation can occur while recollections are freshest and evidence is retained, and so that remedial action can be taken in a timely manner where appropriate. In addition, any conduct that becomes known to I-House that may be in violation of this policy may be investigated, regardless of whether a complaint is filed.

Any questions concerning where or to whom to report an incident of prohibited discrimination or prohibited harassment should be directed to the Vice President for Programs & Resident Life. If the Programs & Resident Life Office is implicated in the alleged discrimination or harassment, the report should be made to the Vice President of People and Culture.

#### VII. CONFIDENTIALITY

I-House will maintain the confidentiality of the complaint to the greatest extent possible, consistent with the goals of conducting a thorough and complete investigation and effecting any appropriate remedial action.

#### VIII. VIOLATIONS OF THIS POLICY

Acts of prohibited discrimination and prohibited harassment against an I-House Resident Member violate this policy. Retaliation is also a separate violation of this policy. I-House is committed to addressing allegations of prohibited discrimination, prohibited harassment, and retaliation promptly, in accord with its investigative procedures, and will take action necessary to ameliorate such prohibited discrimination, prohibited harassment, and retaliation, including by taking disciplinary measures, as necessary.

## IX. INVESTIGATION AND RESOLUTION PROCEDURES

Where allegations are made against Resident Members for possible violation of this policy, the matter will be investigated and resolved in accordance with the I-House Disciplinary Process.

Where allegations are made against employees for possible violation of this policy (including allegations that the I-House has engaged in retaliation), the matter will be investigated and resolved utilizing the procedures established by the Office of People and Culture.

Where allegations are made against third parties concerning possible violation of this policy, the Vice President for Programs & Resident Life shall identify the appropriate procedures that apply based on the role of the third party and the nature of any contractual relationship with I-House.