



ROSALIND FRANKLIN
UNIVERSITY
of MEDICINE AND SCIENCE

POLICY ON HARASSMENT AND DISCRIMINATION

Effective April 15, 2026

1. Introduction and Purpose

Rosalind Franklin University of Medicine and Science, along with the Rosalind Franklin University Health Clinics (collectively hereinafter “RFU”) believes that all students and employees should be treated with dignity and respect and therefore maintains a policy that prohibits harassment and discrimination against all students, faculty and staff regardless of race, color, gender, gender identity, sex, sexual orientation, religion, national origin (including shared ancestry or ethnic characteristics) disability, veteran or military status, marital status, pregnancy status, age, family responsibilities, reproductive health decisions, citizenship status, or any other status protected by law. Prohibited conduct also includes retaliation and sexual misconduct that may not meet the definition of sexual harassment under Title IX or other applicable federal or state law but nonetheless violates RFU policy. Any form of discrimination or harassment that has the effect of substantially interfering with the individual's performance or creates an intimidating, hostile, or offensive learning/working environment is not tolerated by RFU.

Employees have the right to contact the Illinois Department of Human Rights (IDHR) Chicago: 312-814-6200 or 800-662-3942, and Chicago TTY: 866-740-3953 (for those with hearing or speech disabilities) to report a complaint. An IDHR complaint must be filed within 2 years of the alleged incident(s), unless it is a continuing offense. Employees may also report a complaint within 300 days of the incident to the Equal Employment Opportunity Commission (EEOC), including the Chicago District Office at 1-800-669-4000 or TTY: 1-800-669-6820.

2. Scope and Application

This policy establishes a protocol whereby those who believe they have been discriminated against or harassed may obtain resolution promptly and equitably through formal and informal procedures of RFU. This policy applies to all members of the RFU community, each of whom is expected to promptly report complaints about violations. No action shall be taken against anyone who submits a complaint in good faith regardless of the outcome of the investigation; however, any person found to be intentionally dishonest in making the allegations or to have made them maliciously is subject to disciplinary action.

Any student or employee found to be in violation of this policy shall be subject to disciplinary action. Students are subject to the Student Conduct Policy, which may include, but is not limited to, written warning, developmental sanctions, mandated training/education, probation, suspension, or expulsion. Employees found in violation of this policy shall be subject to disciplinary action as outlined in the Employee Handbook which includes written warnings, mandatory training, and possible termination of

employment.

3. Definitions

Protected Statuses: Race, color, gender, gender identity, sex, sexual orientation, religion, national origin (including shared ancestry or ethnic characteristics), disability, veteran or military status, marital status, pregnancy status, age, family responsibilities, reproductive health decisions, citizenship status, or any other status protected by law.

Discrimination: Unfair or unequal treatment of an individual or group based on a protected status and thereby causing an adverse employment or academic action or exclusion from participation in or denied benefits of a university program or activity.

Harassment: A form of discrimination and unwelcome conduct based on an individual or group's protected status. Unwelcome conduct may be verbal, physical, visual, written, or virtual. This policy is violated when unwelcome conduct based on a protected status, considered in the totality of the circumstances, is (1) subjectively and objectively offensive; and (2) so severe or pervasive that it (3) adversely affects a term or condition of employment or participating in a university program or activity, or limits or denies a person's ability to participate in or benefit from a university program or activity. Even where the conduct is not sufficiently severe or pervasive to rise to the level of a violation of this Policy, RFU discourages any such conduct in the workplace and/or any of our related educational settings and reserves the right to take remedial action for such conduct in accordance with other RFU policies, including its Code of Conduct and Student Conduct Policy.

Sexual Misconduct: Sexual misconduct under this policy includes unwelcome conduct of a sexual nature, including but not limited to verbal, nonverbal, written, electronic, or physical conduct, that unreasonably interferes with an individual's educational or work environment, even if the conduct does not rise to the level of sexual harassment as defined by Title IX.

Retaliation: Retaliation is any materially adverse action, intimidation, threat, coercion, or discrimination taken against an individual because they, in good faith, reported or opposed conduct prohibited by this Policy or the Title IX Policy.

Non-Discrimination Response Team: The Non-Discrimination Response Team consists of the Title IX Coordinator, the Dean of Students, and the Associate Vice President for Human Resources. The Nondiscrimination Response Team is responsible for coordinating RFU's response to notice or reports of discrimination, harassment, sexual misconduct, and retaliation under this policy and the RFU Title IX Policy.

4. Procedures

A reported violation of this Policy may be handled through an informal resolution or formal resolution, as described below. The University may initiate an investigation and resolution even when no information or formal complaint has been filed if the University becomes aware, directly or indirectly, of a potential violation of this Policy.

a. Informal Complaint Resolution

Any member of the University community may seek advice, or information, on matters related to harassment or discrimination without having to lodge a formal complaint. Students or employees who feel they are being harassed or discriminated against, or are uncertain as to whether what is experienced is harassment or discrimination, are encouraged to talk to a member of the Non-Discrimination Response Team (). The complaining party (the "complainant") will be informed as to the options available under this Policy, including upgrading the informal complaint to a formal written complaint.

At the complainant's request or when deemed appropriate by the NDRT, steps may be taken to resolve the complaint informally. The aim of the informal resolution process is to ensure that the alleged offending behavior ceases and that the matter is resolved promptly. The complainant's name will, to the extent reasonably possible, be kept confidential during informal resolution unless the complainant agrees that others may be informed to help reach a resolution. The NDRT may decide when notification of the alleged offender is necessary. If appropriate, a constructive, informal discussion may be held with the person accused of violating this harassment policy. An informal resolution may also involve an agreement to pursue individual or community remedies, educational programming or training, or other forms of resolution tailored to the needs of the parties.

An informal complaint may also be converted to a formal complaint by the NDRT because of the severity of the factual allegations made by the complainant, the alleged behavior is a violation of state or federal law, or because of the frequency of allegations against the alleged offender (see section below).

b. Formal Complaint Resolution

Prior to any formal action, a formal complaint must be submitted to a member of the NDRT or through the [incident reporting form](#) in writing, identifying the alleged conduct, complainant, and the alleged offender, if available.

- i.* After a written complaint has been received by a member of the NDRT, the NDRT will meet to review the complaint and a lead will be appointed. The lead will promptly assign at least one investigator, who will conduct an investigation of the alleged harassment or discrimination. For complaints involving students and employees, two investigators will be assigned by the NDRT lead.
- ii.* The investigation will include, at a minimum, an interview with the complainant. The alleged offender will be interviewed if it is determined that the allegations, if true, would constitute a violation of this policy. The alleged offender will then be informed of the nature of the allegations, the identity of the complainant, if available, and the facts surrounding the allegations. The alleged offender will also be afforded a full opportunity to respond to the allegations. Any other person who may have information regarding the alleged harassment may also be interviewed.
- iii.* Notes and documentation of all interviews relating to the investigation will be maintained by the NDRT. All matters related to the investigation shall remain confidential to the extent permitted by law, provided it does not interfere with the University's ability to investigate or take corrective action.
- iv.* The investigation findings will be submitted to the lead NDRT member for review as soon as practicable, typically within 60 working days of the receipt of the written complaint. The report shall include the allegation, the investigative process, the persuasiveness of the evidence, and the credibility of the witnesses. The report shall arrive at one of the

following three findings based upon the preponderance-of-the-evidence standard (i.e., whether it is more likely than not that harassment or discrimination occurred):

1. Harassment or discrimination has occurred;
 2. Harassment or discrimination did not occur; or
 3. There is inconclusive evidence as to whether harassment or discrimination occurred.
- v. Students who are found in violation of this policy will then be referred to the Student Conduct Policy for additional applicable procedures, including the appeal process. In cases involving employees, the Associate Vice President of Human Resources will consult with the respective Dean/VP that oversees the employee to determine appropriate disciplinary action. Decisions made by the Associate Vice President of Human Resources and the respective Dean/VP for employees are final. Notification of the findings and disposition shall be provided, confidentially, in writing, to both the complainant and the alleged offender by the NDRT lead.

All complaints and associated resolutions will be kept on file in accordance with accreditation requirements and federal and state law by the Dean of Students and Associate Vice President for Human Resources.

5. Point of Contacts

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847-578-3266

Shelly Brzycki
Dean of Students
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847-578-8355

Heather Kind-Keppel
Associate Vice President for Community and Campus Outreach
Title IX Coordinator
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6. References and Related Policies

In some instances, the NDRT may reference or utilize additional RFU policies which may apply to the complaint. These other policies may include, but are not limited to:

- [Title IX Policy](#)
- Behavior Intervention Team Policy
- [Campus Emergency Operations Plan](#)

- [Student Handbook](#)
- [Standards of Conduct from the Employee Handbook](#)
- [RFU Code of Conduct](#)