TEXILA AMERICAN UNIVERSITY

Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy

This university policy seeks to promote and maintain an environment free from discrimination, harassment, and retaliation, and to support the safe operation of university facilities and activities. It applies to Texila American University (TAU) and to all affiliated entities directly involved with TAU in managing its operations.

1. Introduction

To promote and maintain a safe and healthy environment for its trainers, staff, students, and visitors, Texila American University (TAU) and its affiliated entities are committed to:

Maintaining an environment free from discrimination. Discrimination based on race, color, creed, religion, disability, gender, gender identity, socio-economic status, national origin, age, familial status, marital status, height, weight, or sexual orientation is prohibited.

This Anti-Discrimination Policy makes clear that harassment and discrimination will not be tolerated, and it sets standards and expectations for behavior. It describes the types of behavior that are discriminatory or harassing and communicates that these issues are taken seriously across TAU and every affiliate that participates in managing TAU's operations.

1.1 Reason for Policy

TAU is committed to maintaining and strengthening an educational, working, and living environment where students, faculty, staff, visitors, and applicants for admission or employment are free from discrimination and harassment of any kind. This commitment extends to TAU's affiliated entities that are directly involved in managing TAU's operations — including, but not limited to, Texila Educational and Medical Services (TEMS), which manages student recruitment and related operations for TAU in North America. Discrimination and harassment are antithetical to the standards and ideals of the University and its affiliates. TAU and its affiliates will take appropriate action to eliminate discrimination and harassment from occurring, prevent recurrence, and address effects where they do occur.

1.2 Purpose

The purpose of this policy and procedure is to ensure there are clear and concise guidelines in place regarding the treatment of all staff, students, and other stakeholders with respect, regardless of gender, age, sexual orientation, ethnicity, religion, politics, or disability, and to ensure that there is no unlawful discrimination in any activity carried out by TAU or on TAU's behalf by an affiliated entity.

1.3 Scope

This policy and procedure apply to all staff, students, visitors, and contractors of Texila American University (TAU), and to all affiliates and affiliated entities that are directly involved with TAU in managing its operations, wherever located. This includes, without limitation, Texila Educational and Medical Services (TEMS), which handles student recruitment and related functions on TAU's behalf in North America, and any other entity operating under agreement with TAU to perform recruitment, administrative, academic, or operational functions on TAU's behalf.

Each such affiliate is expected to adopt, or to operate consistently with, the standards set out in this policy in all of its dealings with applicants, students, staff, and members of the public on behalf of TAU.

1.4 Policy Statement

Discrimination can manifest in many direct and indirect forms. TAU recognizes the following attributes protected by law:

- Age
- Disability
- Family responsibilities
- Gender reassignment
- Race
- Religion or belief
- Sex
- Gender identity or intersex status
- Sexual orientation
- Marriage and civil partnership
- Pregnancy, maternity, and breastfeeding

TAU and its affiliates seek to avoid any discrimination that leads to a student, member of staff, or other stakeholder being treated less favorably than another because of their background or other protected characteristics.

Discrimination includes, but is not limited to, the following:

- Activity which permeates or colors the working environment with discriminatory innuendo or jokes. Unacceptable behavior includes poster displays, telling discriminatory jokes, or making racially derogatory remarks about a person. It can include sending emails, displaying or discussing material, or making suggestively discriminatory comments.
- Behavior which is personally directed. This category includes unwanted name calling, uninvited physical contact, suggestive or overly personal remarks about another person's appearance, beliefs, and personal life, or following or stalking a person or making inappropriate telephone calls to their home.
- Unreasonable rules or policies which have an unfair effect on people who share a particular attribute.
- Uninvited and unreasonable requests or demands from a person, especially where refusal might adversely affect conditions of, or opportunity for, admission, employment, or promotion. This can include actual or threatened assaults.

1.5 Harassment

Harassment is a form of discrimination and is strictly prohibited. It includes any unwelcome conduct related to a protected attribute listed in Section 1.4 that has the purpose or effect of violating a person's dignity, or of creating an intimidating, hostile, degrading, humiliating, or offensive environment for that

person. Harassment may be a single serious incident or a persistent pattern of behavior, and may occur in person, in writing, electronically (including email, messaging platforms, and social media), or through any other medium. It includes, without limitation, the behaviors described in Section 1.4, as well as "quid pro quo" conduct in which submission to, or rejection of, unwelcome conduct is used as a basis for decisions affecting a person's admission, employment, evaluation, or advancement.

This prohibition applies equally to conduct by or toward TAU staff, students, contractors, visitors, and personnel of TAU's affiliated entities, regardless of where the conduct occurs, where it has a connection to TAU's or an affiliate's operations, programs, or activities.

1.6 Retaliation Prohibited

TAU and its affiliates strictly prohibit retaliation against any person who, in good faith, reports discrimination or harassment, files a complaint, participates in or cooperates with an investigation, or opposes conduct that they reasonably believe violates this policy. Retaliation includes any adverse action — such as termination, demotion, denial of promotion, unfavorable evaluation, exclusion from activities, threats, or other unfavorable treatment — taken because a person engaged in any of the activities described above.

A good-faith report or complaint made under this policy, even if it is not ultimately substantiated, will not itself result in disciplinary action against the person who made it. Retaliation is treated as a serious violation of this policy in its own right, independent of the outcome of the underlying discrimination or harassment complaint, and will result in disciplinary action up to and including termination or, in the case of an affiliate, termination of the affiliate's engagement with TAU.

Anyone who believes they have experienced retaliation should report it immediately using the same channels described in Section 1.7 for reporting discrimination or harassment.

1.7 Dealing with Discrimination, Harassment, and Retaliation

Before an employee, contractor, student, visitor, or affiliate representative approaches an external body to report alleged discrimination, harassment, or retaliation, TAU would like the opportunity to address the allegations in-house. On that basis, any employee, contractor, student, visitor, affiliate representative, or other affected person who makes a complaint in good faith will be treated with consideration, and their complaint will be taken seriously and investigated or otherwise dealt with sympathetically and fairly. Complaints will be attended to promptly and confidentially in the manner set down in the Institute's Student Code of Conduct and Staff Code of Conduct. Where a complaint concerns the conduct of an affiliate, the affiliate is expected to cooperate fully with TAU's investigation process.

1.7.1 Role of Managers/Supervisors

Managers and supervisors, including those employed by an affiliated entity acting on TAU's behalf:

- Are responsible for monitoring the working environment to ensure that acceptable standards of conduct are always observed, and to model appropriate behavior and anti-discriminatory practice

in all activities and interactions with students, other staff members, contractors, partners, and stakeholders.

- Must promote this Anti-Discrimination, Anti-Harassment, and Anti-Retaliation Policy and Procedure within their work area.
- Must treat all complaints seriously and take immediate action to investigate and resolve the matter.
- Must refer the matter to People and Culture or a member of the Leadership Team if they do not feel they are the best person to deal with the case.
- Must ensure they are familiar with the Institute's Student Code of Conduct and Staff Code of Conduct.

1.7.2 Role of Staff

All members of staff, including staff of TAU's affiliated entities:

- Have responsibility for complying with the Institute's Staff Code of Conduct.
- Should offer support to anyone who is facing discrimination and let them know where they can get help and advice (they should not, however, seek to deal with the perpetrator of discriminatory action directly, but should advise resolution of the matter through the Institute's Staff Code of Conduct and Student Code of Conduct).
- Should maintain complete confidentiality if they provide, or are provided with, information during any investigation of a complaint relating to discrimination.

1.7.3 Role of Students

All TAU students:

- Have responsibility for complying with this Anti-Discrimination Policy and Procedure.
- Should familiarize themselves with the policy and how to seek support.
- Should maintain complete confidentiality if they provide, or are provided with, information during any investigation of a complaint relating to discrimination.

1.8 Related Documents/Policies

- Student Handbook
- Faculty Handbook – College of Medicine
- Faculty Handbook – Non-Medicine Programs
- Policy on Diversity and Equality
- Radicalization and Extremism Prevention Policy

1.9 Relevant Information

Nil

Template Revision History

Version	Description	Prepared By	Date Prepared	Reviewed By	Date Reviewed	Approved By / Date
18.0	Initial Release	Faculty Executive Committee	2018, November 19th	Dr. Hugh Duckworth	2018, November 26th	Mr. Shyam – 2018, December 4th
23.0	Revision	IQAC	2023, August 24th	Dr. Hugh Duckworth	2023, August 24th	Mr. Shyam – 2023, August 28th
24.0	Revision – Scope expanded to cover TAU affiliates directly involved in managing TAU operations (e.g., TEMS); Harassment and Retaliation Prohibited sections added		2026, July 28th			

Standard: ISO 9001: 2015