

Anti-Hazing Policy

National Trade Academy (“NTA”) prohibits hazing as defined in this Anti-Hazing Policy “Policy”) and will investigate and respond to all reports of hazing as outlined in this Policy.

Article I

Application:

- 1) This Policy only applies to members of the NTA community, such as faculty, staff, students, volunteers, organizations, and groups, as well as visitors and other licensees and invitees (“Affiliated Members”).
- 2) This Policy only applies to conduct that occurs on or off NTA’s premises, between two or more Affiliated Members.

Article II

Definitions:

The following definitions shall apply to this Policy:

- “Hazing” means doing any act or coercing another, including the victim, to do any act of initiation into any student or other organization or any act to continue or reinstate membership in or affiliation with any student or other organization that causes or creates a substantial risk of causing mental or physical harm to any person, including coercing another to consume alcohol or a drug of abuse, as defined in section 3719.011 of the Revised Code;
- “Organization” includes a national or international organization with which a fraternity or sorority is affiliated;
- “Institution of higher education” means National Trade Academy;
- “Students” are individuals enrolled in at least one of NTA’s programs; and
- “Volunteer” an individual who advises or coaches an organization recognized by or operating under the sanction of NTA, who has direct contact with students, and who is acting in an official and professional capacity.

Article III

Violation of Policy:

A violation of the following is a violation of this Policy:

- 1) No Affiliated Member shall recklessly participate in the hazing of another while an Affiliated Member;
- 2) No faculty member shall recklessly permit the hazing of any Affiliated Member;
- 3) No Affiliated Member shall recklessly participate in the hazing of another when the hazing includes coerced consumption of alcohol or drugs of abuse resulting in serious physical harm to the other person;
- 4) No administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of any organization, including any primary, secondary, or post-secondary school or any other educational institution, public or private, shall recklessly permit the hazing of any Affiliated Member when the hazing includes coerced consumption of alcohol or drugs of abuse resulting in serious physical harm to that person;
- 5) No administrator, employee, faculty member, teacher, consultant, alumnus, or volunteer of any organization, including any primary, secondary, or post-secondary school or any other public or private educational institution, who is acting in an official and professional capacity shall recklessly fail to immediately report the knowledge of hazing to a law enforcement agency in the county in which the victim of hazing resides or in which the hazing is occurring or has occurred; and
- 6) Falsifying, distorting, intentionally omitting, or misrepresenting information during an investigation or reporting a violation under this Article.

Article IV

Sanctions:

1. A violation under Article III is subject to the following sanctions: reprimand; suspension; expulsion; revocation of certification; termination of employment, and any other action deemed appropriate under the circumstances. In addition, other educational activities may be required as conditions of the sanction. An individual, organization, or group may be subject to other outcomes in accordance with the applicable outside constituents or group in which the student is involved, or their governing bodies. NTA has the right to take action regardless of the actions of the governing body.
2. Before an individual(s) can be sanctioned under this Article, each individual who is alleged to have violated this Policy must be notified and allowed an opportunity to meet with the Hazing Prevention Coordinator to discuss the sanctions.

Article V

Enforcement:

All allegations of hazing shall be reported to the Hazing Prevention Coordinator or designee. The Hazing Prevention Coordinator, or designee, shall coordinate the investigation of all hazing allegations.

- 1) NTA will determine if interim measures are needed to protect the safety and/or well-being of others
- 2) The Hazing Prevention Coordinator, or designee, will launch an immediate investigation into all reports of hazing involving Affiliated Members. The investigator(s) will determine the relevance of the information or witnesses. In completing the investigation, the investigators may:
 - a. Make contact (if possible) with the individual(s) who submitted the Hazing Reporting Form.
 - b. Make contact with the individual(s) alleged to have violated this Policy. If the conduct involved a student organization or student group, the investigator(s) will contact the presiding student leader and advisor of the entity under investigation.
 - c. Interview any individuals with relevant information.
 - d. Request relevant information from members of the student group or student organization (e.g. text messages, screenshots, pictures, videos).
 - e. Require members of the student group or student organization, or a select group of members, to meet with staff and may restrict communication between the student group or student organization members during an interview.
 - f. Request students to undergo a physical examination by an appropriate medical professional to share a summary of the relevant results of the examination (e.g. findings of physical abuse, Blood Alcohol Content, drug usage). The summary will be considered an educational record under the Family Educational Rights and Privacy Act.
- 3) Affiliated Members are not compelled to answer questions or provide information. If an Affiliated Member fails to participate in the investigation, NTA may proceed to resolve the matter. No adverse inference may be drawn against an Affiliated Member who does not participate in the investigation.
- 4) Affiliated Members participating in an investigation process are expected to do so in an active, cooperative, and truthful manner.
- 5) At the conclusion of the investigation, the Hazing Prevention Coordinator will present the findings to NTA's Director and Owner. The Director, Hazing Prevention Coordinator, and Owner will decide if hazing has occurred. If hazing has occurred, they will immediately report it to local law enforcement and determine from the list of possible sanctions defined in Section IV what sanctions to apply.

Article VI

Reporting:

To report hazing, fill out the following google form: https://docs.google.com/forms/d/1lw3WWDE06wTZGw6P9aleMRCRof_E4Sy-IRYPSAda2q4/prefill. This form may be filled out anonymously:

Article VII

Distribution of the Policy:

- 1) This Policy will be posted on NTA's website.
- 2) Each current and new non-student Affiliated Member will be emailed a copy of the Policy and will be required to sign an Anti-Hazing Acknowledgement Form.
- 3) Each new NTA organization will be emailed a copy of the Policy and will be required to sign an Anti-Hazing Acknowledgement Form.
- 4) Before or at each Student's first class, students will be given the Policy and required to sign an Anti-Hazing Acknowledgement Form.

Article VIII

Training and Education:

A student who does not comply with this Article shall be prohibited from participating in an organization recognized by or operating under the sanction of NTA until the student complies with this Article. An organization shall not accept or initiate any person who has not complied with this Article.

All Students must complete the following training and education program:

- (1) Visit at least one of the websites listed in the Awareness Campaign Resources Section of Appendix A of The Statewide Education Plan for Preventing Hazing, <https://www.ohiohighered.org/sites/default/files/uploads/hazing/Statewide%20Educational%20Plan%20for%20Preventing%20Hazing.pdf>.
- (2) Read the Comprehensive Hazing Scenarios provided by NTA's Staff.
- (3) Read the Hazing Bystander Intervention Handout provided by NTA's Staff
- (4) Read this Policy. Also, note that the following violations of this Policy may carry potential criminal penalties:
 - a. A violation of Article III Section 1 & 2 could lead to a misdemeanor of the second degree. See OHIO REV. CODE ANN. § 2903.31.
 - b. A violation of Article III Section 3 & 4 could lead to a felony of the third degree. See OHIO REV. CODE ANN. § 2903.31.
 - c. A violation of Article III Section 5 could lead to a misdemeanor of the fourth degree, except that the violation is a misdemeanor of the first degree if the hazing causes serious physical harm. See OHIO REV. CODE ANN. § 2903.311.

Article IX

Good Faith Compliance:

A NTA employee, student, or volunteer shall be individually immune from liability in a civil action for damages arising from reporting an incident in accordance with this Policy if the incident is reported promptly, in good faith, and in compliance with this Policy.

Article X

Disclaimer:

This Policy supersedes all prior anti-hazing policies.