

Non-Harassment and Non-Discrimination Policy

Reviewed and Approved by GMEC July 8, 2016

Reaffirmed by GMEC March 12, 2021

The McGaw Medical Center of Northwestern University (“McGaw”) is committed to providing and maintaining a healthy, inclusive, and nonbiased learning environment and educational culture for all housestaff, faculty and other members of the McGaw community including patients and employees of affiliated educational institutions and medical facilities. This commitment includes maintaining an educational environment that is free of unlawful discrimination and harassment on the basis of any legally protected status. In accordance with McGaw's educational goals and mission and applicable law, McGaw does not discriminate or tolerate harassment based on sexual, racial, national origin or any protected group status. McGaw will not tolerate any form of harassment or discrimination including sexual harassment in violation of this policy by or against any housestaff involving anyone in the McGaw community, including other housestaff, faculty, medical staff, patients, vendors, employees or affiliated medical institutions and/or any other third party.

Prohibited Conduct

The conduct prohibited by this policy includes unwelcome conduct, whether verbal, physical or visual, that is based upon a characteristic protected by law, such as sex, race, color, religion, ancestry or national origin, age, disability, marital status, parental status, sexual orientation, veteran status, citizenship status, or other protected group status as defined by law. McGaw will not tolerate harassing conduct that unreasonably interferes with an individual's education or that creates an intimidating, hostile, non-inclusive, or offensive educational environment. Such harassment may include, for example, jokes or epithets about another person's protected status or teasing or practical jokes directed at a person based on his or her protected status. It may also include the display or circulation of written materials or pictures that are degrading to a person or group described above or verbal abuse or insults about, directed at, or made in the presence of an individual or group of individuals in a protected class. Conduct of this sort is prohibited by this policy without regard to whether the conduct would violate applicable laws. It is the policy of McGaw not to discriminate against any individual on the basis of sex, race, color, religion, ancestry or national origin, age, disability, marital status, parental status, sexual orientation, veteran status, citizenship status, or other protected group status as defined by law in matters of admission, services or educational programs or activities in accordance with the requirements of all applicable laws.

Definition of Sexual Harassment

Prohibited sexual harassment is defined to include unwelcome sexual advances, requests for sexual favors, and other verbal, physical or visual conduct based on sex when: (1) submission to such conduct becomes an implicit or explicit term or condition of any individual's education including any training, advancement, continuation in the program or other academic decision relating to the graduate medical educational program; (2) submission to or rejection of the conduct is used as the basis for any educational decision including training, advancement, continuation in the program or other academic decision, or (3) the conduct has the purpose or effect of unreasonably interfering with an individual's educational or training performance or creating an intimidating, hostile or offensive educational environment.

Sexual harassment is not limited to explicit demands for sexual favors. It may include other unwelcome conduct based on sexual favors. It may include other unwelcome conduct based on sex, whether directed toward a person of the opposite or same sex and also may include such actions as: (1) sex-oriented verbal kidding, teasing or jokes; (2) repeated sexual flirtations, advances or propositions; (3) continued or repeated verbal abuse of a sexual nature; (4) graphic or degrading sexually-oriented comments about an individual or his or her appearance or sexual activity; (5) visual conduct, including leering, making sexual gestures, or the display of sexually suggestive objects or pictures, cartoons or posters; (6) pressure for sexual activity; (7) suggestive or obscene letters, notes or invitations; or (8) offensive physical contact such as patting, grabbing, pinching or brushing against another's body.

Reporting Procedures

Everyone at McGaw is responsible to help assure that our educational environment is free from all forms of prohibited discrimination or harassment. If you believe you have experienced or witnessed any conduct that may be inconsistent with this policy, you are to immediately notify any of the following:

1. Any McGaw Program Director
2. Joshua L. Goldstein, MD Senior Associate Dean of GME (312-503-7975)
3. Nancy Parlapiano, Executive Director of Graduate Medical Education (312-503-4536)
4. Linda Suleiman, MD, McGaw Director of Diversity and Inclusion (312-472-6098)

All formal complaints of harassment will be investigated as outlined in the Safe and Health Learning Policy. It is the obligation of every member of the McGaw community to cooperate in any investigation of alleged or suspected harassment or retaliation. If an investigation confirms that a violation of this policy or inappropriate conduct has occurred, McGaw will take corrective action as is appropriate under the circumstances. In the event of harassment by an individual other than a member of the housestaff, McGaw shall immediately contact the appropriate designated representative of the affiliated institution and/or take other action as deemed appropriate.

Such affiliated institution and McGaw shall then work jointly to reach a resolution to the issue.

Prohibition of Retaliation

McGaw forbids retaliation against anyone for reporting harassment, registering a complaint pursuant to this policy, assisting in making a harassment or discrimination complaint, participating in an investigation, filing a charge of discrimination, or otherwise pursuing his/her rights under applicable municipal, county, state and federal laws. Anyone experiencing or witnessing any conduct he or she believes to be retaliatory should immediately report it to any of the individuals named above.

Confidentiality

McGaw is committed to balancing the interests of all parties involved in harassment or discrimination complaints. McGaw will attempt to keep the name of the complainant confidential consistent with its need to investigate complaints and to respect the rights of the accused harasser.

Moreover, when credible information received through an investigation indicates that there may be violations of other McGaw or affiliated institution policies, appropriate officials will be notified. Information related to complaints and investigations will be shared only with those representatives of the interested parties who have a need to know in order to investigate and resolve the matter.

Investigation Process

The Senior Associate Dean of GME or his designee shall be responsible for investigating all reported complaints of harassment or discrimination within the McGaw community by working with appropriate McGaw officials and officials of affiliated McGaw entities. Once the initial investigation is completed, including notice of the allegations and an opportunity to be heard, any housestaff member(s) found in violation of this policy will be subjected to corrective or disciplinary action including but not limited to reprimands, academic probation, termination or expulsion from the program.