

Kappa Psi Pharmaceutical Fraternity, Inc. Risk Management Procedures

Effective Date: August 2016

Purpose

Risk management may be defined as taking appropriate proactive measures to minimize the risk associated with Fraternity activities and to assure the safety and well-being of Members and non-Members interacting with a Chapter, Province, or the Fraternity in any way. The purpose of this procedure is to assist Individuals, Chapters, Provinces, and the Fraternity as a whole in mitigating risks when planning activities and addressing potential violations to the fraternity's risk management policy if infractions should occur. The goal of this procedure is to outline educational requirements associated with risk management requirements by the Fraternity, mitigate risks when applicable, and provide pathways for reporting of risks. Risk management is a dynamic process involving the following:

- Identification of exposure to loss
- Analysis or evaluation of exposure to loss
- Elimination/avoidance or reduction of exposure to loss
- Reanalysis of reduced exposure to loss
- Assumption or transfer of exposures
- Monitoring of results and adjustments

Responsibilities of the Chapter

- The Chapter shall be responsible for annually instructing its Members and Pledges on the Kappa Psi Pharmaceutical Fraternity, Inc. Risk Management Policy and Procedure.
- The Chapter shall provide each Member and Pledge a copy of the Fraternity's Risk Management Policy and Procedure.
- The Chapter shall ensure that each Member will sign the "Kappa Psi Pharmaceutical Fraternity Inc. Risk Management Policy Acknowledgement" Form prior to participating in Chapter activities.
 - Collegiate Chapters shall ensure Pledges sign the Form prior to or at the start of the first Pledge activity/meeting.
 - In the event of a transfer from another Chapter, the transferring Member must re-sign the form to be kept on file with the new Chapter.
 - Whenever the Risk Management Policy or Procedure is revised, all Members and Pledges will read the entire revised policy and procedure documents and re-sign the acknowledgement form.
 - The Chapter will retain all current signed forms for the entire period the Member or Pledge is active with the Chapter.
 - The Chapter is encouraged to have any Graduate Brother present at Chapter events review and sign a form as well.

- Chapter Risk Management Committees shall take an active role in fulfilling Chapter Risk Management objectives including:
 - Develop and/or present the Chapter's Annual Risk Management training.
 - Retain current copies of the Chapter Members' signed "Kappa Psi Pharmaceutical Fraternity Inc. Risk Management Policy Acknowledgement" forms.
 - Assist completion and retention of "Activity Risk Assessments" as applicable.
 - Ensure implementation of risk mitigation strategies indicated on "Activity Risk Assessments".
- Chapters that are on probation or suspension by their college or school of pharmacy must report this status to the Central Office within 5 business days.

Responsibilities of the Provinces

- The Province will strive to educate annually the Chapters in their Provinces through scheduled workshops or seminars.
- The Province will work with the Supervisors to ensure all aspects of the Province meetings adhere to Kappa Psi Pharmaceutical Fraternity, Inc. Risk Management Policy and Procedure.

Responsibilities of the International Executive Committee

- The international leadership will educate, when possible, the membership through mailings, the Kappa Psi publication (The Mask), and workshops at the biennial Grand Council Convention.

Risk Management Procedures

All Provinces, Chapters and Members of the Fraternity shall:

- Complete an "Activity Risk Assessment" before hosting a function for the Chapter, Province, or Fraternity.
 - At the Chapter level, the Risk Assessment shall be submitted to the Regent and GCD, prior to each function, for review.
 - At the Province level, the Risk Assessment shall be submitted to the Satrap and Supervisors, prior to each province meeting, for review.
- Identify actions which could result in liability, injury, or death.
- Analyze the risks involved in planned actions and become cognizant of ways to reduce risk so exposure to liability is minimized.
- Incorporate measures that will serve to protect each Member or non-Member.
- Remove foreseeable risks involved with hazing and alcohol.
- Prevent situations that facilitate illegal behavior including but not limited to: underage consumption alcohol, driving under the influence of alcohol or drugs and the use of mind altering substances for non-medical purposes.

Alcohol and Substance Abuse Procedures

The Fraternity, its Provinces, Chapters & Members shall implement the following strategies when organizing activities where alcohol is to be present:

- Provide and promote other activities, besides drinking alcohol, as the central focus of hosted events such as networking, dancing, sports, or other types of games.
- Make sufficient food and non-alcoholic refreshments accessible to all guests at social events.
- Ensure a certain number of Members remain completely sober to act as “party monitors” during events. The recommended percentage is no less than 10% of total anticipated attendees. These individuals must be readily identifiable (wearing jackets, hats, arm bands, etc.).
 - Plan accordingly, prior to each event, ways to prevent impaired driving (designated drivers, taxi numbers, etc.).
 - Ensure that any gathering, where alcohol may be present, must include a guest list and have proper methods of Identification. To include:
 - Filling out guest lists at least 24 hours in advance with the appropriate local authorities, and must be limited to no more than 2 guests per member.
 - Checking IDs of all guests and Members and those over 21 must be identified in some manner; such as, bracelets, stamps on hands, etc.
 - Arranging for a non-Member to check IDs, most commonly this means campus or hired security officers.

Policy Violations

The following definitions are to be used when assessing potential violations or incidents:

- **MILD INCIDENTS** – Policy or Procedure was potentially violated, health and wellness of all Members and non-Members was uncompromised, and no laws were broken. Incidents typically deemed to be administrative in nature such as forms not completed or signed.
- **MODERATE INFRACTIONS** - Policy or Procedure was potentially violated, health and wellness of all Members and non-Members was uncompromised, and no laws were broken. Infractions where harm or liability could have occurred such as alcohol brought to an event were ID's were not appropriately checked, behavioral issues with a Member or Pledge or Fraternity event advertised with alcohol being present.
- **SEVERE INFRACTIONS** - Policy or Procedure was potentially violated, health and wellness of a Member or a non-Member may have been compromised, and

laws may have been broken. Incidents such as harassment, hazing, or any illegal behavior surrounding alcohol or other mind altering substances.

Reporting & Investigation

If, at any time, any aspect of the Kappa Psi Pharmaceutical Fraternity, Inc. Risk Management Policy or Procedure is violated by any Member or Pledge of Kappa Psi, the Fraternity requires the event be reported as follows:

- The Chapter Member(s) who has/have knowledge of any violation of the policy or procedure will contact their Faculty Grand Council Deputy(ies) and/or Faculty Advisor(s) such that his or her respective Colleges/Schools of Pharmacy are aware of the violation. Other GCDs may be contacted as applicable.
 - Potential incidents deemed **MILD** in nature must be communicated within forty-eight (48) hours to the appropriate person(s) via any means including electronic (email).
 - Potential infractions deemed to be **MODERATE** or **SEVERE** in nature must be communicated immediately to the appropriate person(s). Acceptable means of communication include telephone or in-person. Electronic means are acceptable only if no other reasonable option has been successful.
- Any International Officer, Province Officer, Chapter Officer, Grand Council Deputy, or Alumni who has knowledge of an incident/infraction which violates the Risk Management Policy or Procedure will notify the appropriate person(s) as follows:
 - Potential incidents deemed **MILD** or **MODERATE** in nature will be communicated to the respective Chapter's Grand Council Deputy or Graduate or Collegiate Chapter Regent, as applicable, with details of the incident stating which specific aspect(s) of the policy or procedure was violated within forty-eight (48) hours.
 - Potential incidents deemed **SEVERE** in nature will be immediately communicated to the Grand Regent with details of the incident stating which specific aspect(s) of the policy or procedure was violated.
 - **Any** incidents involving an International Officer, Province Officers, or Grand Council Deputy will be immediately communicated to the Grand Regent with details of the incident stating which specific aspect(s) of the policy or procedure was violated.
- When the Grand Regent receives notification of a potential violation(s), he or she will address the situation as follows:
 - When involving an International Officer, Province Officer, Graduate Chapter Officer, or Grand Council Deputy, communicate the violation(s) to

the International Executive Committee to initiate a Fraternity-led formal investigation.

- o When involving an Alumni who is not otherwise an officer:
 - o If deemed **MILD** or **MODERATE** in nature, contact the Graduate Chapter Regent or appropriate representative informing them of the violation(s) to initiate a Chapter-led formal investigation.
 - o If deemed **SEVERE** in nature communicate the violation(s) to the International Executive Committee for addressing to initiate a Fraternity-led formal investigation.
- o When involving a Collegiate Member, contact the Faculty Grand Council Deputy/Deputies and/or Faculty Advisor(s) informing them of the violation(s) to initiate a Chapter-led formal investigation. Any additional Grand Council Deputies will be included in this communication as well.
- When a Grand Council Deputy or Graduate Chapter Regent receives notification of a potential violation(s), he or she will address the situation as follows:
 - o The appropriate person will initiate an informal investigation to determine which policy or procedure(s) and person(s) were involved.
 - o For violations deemed to be **MILD** in nature, the appropriate person will designate a Member who will be charged to correct the violation within seven (7) days of notification.
 - o For violations deemed to be **MODERATE** in nature, the appropriate person will initiate a Chapter-led formal investigation as follows:
 - Communicate the violation to the appropriate persons at the respective School/College of Pharmacy when necessary/applicable.
 - Determine what, if any, changes need to address by the Chapter and what, if any, charges need to be filed against a Member or Pledge.
 - Communicate the findings of the formal investigation including a detailed action plan for changes and levied charges to the Grand Regent for review and comment within seven (7) days of notification.
 - o For violations deemed to be **SEVERE** in nature, the Grand Council Deputy will complete the following steps:
 - Immediately communicate to the Grand Regent the nature of the incident including known specifics and identify the particular violated aspect(s) of the policy or procedure.
 - Initiate a Fraternity-led formal investigation.
 - o For violations requiring a Fraternity-led formal investigation an appointed representative of the Grand Regent, (Grand Council Deputy, International

Executive Committee Member or otherwise) will undertake and complete the following steps:

- Create a full and complete report including a list of charges and/or violations of the policy or procedure and the names of the Chapter Officers and/or Members alleged to be involved in the incident.
- The involved person(s) or Chapter will be notified and be required to attend in person or respond in writing to a “show cause” hearing within ten (10) days of notification to explain the alleged violations of the policy and to give reasons why any or all of the following sanctions should not be recommended (procedures shall be in accordance with By-Law III of the Constitution and should follow steps outlined in the *Member Disciplinary Trial Guide*).
- Communicate findings and recommendations to the Dean of the College/School of Pharmacy or the University for implementation as applicable.
- o The Grand Regent or appointed representative will then prepare a full and complete report to the Executive Committee.
- o The Grand Regent may allow for extension of suggested deadlines in extenuating circumstances.

Sanctions & Follow-Up

- If after careful review of the violations and the responses of the accused, the Executive Committee finds the allegations to be true, substantial, and verified, the Executive Committee will uphold and support any of the following sanction options with the Faculty GCD(s)/Faculty Advisor(s), additional GCDs, and the Deans of the College/School of Pharmacy:
 - o Resignation of the Regent, Pledge Educator (in the event of a hazing violation), any Executive Committee Members (present or involved in the violation) from their respective offices in Kappa Psi (including Chapter, Province, and International positions). The Grand Regent, in consultation with the Faculty Grand Council Deputy/Deputies and/or Faculty Advisor(s), will appoint Members to assume the offices vacated.
 - o Placing the Regent and Executive Committee Officers (present or involved in the violation) on social probation which would be governed by the policy of the university involved.
 - o Placing on social probation the individual Members (present or involved in the violation) which is governed by the policy of the university involved.
 - o Suspension of the involved Members from the College/School of Pharmacy or University.

- o Expulsion of the involved persons from Kappa Psi Pharmaceutical Fraternity, Inc.
- o A written education program for the Membership on the specific policy violated shall be submitted to the Fraternity and the Dean of the College/School of Pharmacy within thirty (30) days of the investigation.
- o Disqualification from any and all Kappa Psi Pharmaceutical Fraternity, Inc. awards for the involved Members during the current academic school year.
- o Suspension of the Chapter from the College or University activities.
- o Suspension of rights to pledge and initiate new Members.
- o Requirement of Chapter of involved persons to sponsor or perform community service related to the policy/policies violated.
- o Requirement of the Chapter to conduct workshops related to the violated policy/policies on campus.
- Once sanctions have been imposed by the Dean, the Chapter shall follow the stipulations set forth by the College/School of Pharmacy. Any further violations of this policy or the imposed sanctions placed upon the responsible parties may result in the revocation of the Chapter's Charter by the Executive Committee.

Kappa Psi Pharmaceutical Fraternity, Inc.
Risk Management Policy Acknowledgement Form

I, _____, hereby acknowledge that I have received a copy
(Brother's or Pledge's Printed Name)

(either paper or electronic) of the Kappa Psi Pharmaceutical Fraternity, Inc. Policy of Risk Management, which describes important information about minimizing risk, hazing, alcohol and substance abuse, sexual harassment, human dignity, education, and fire, health, and safety. I further acknowledge that I have read its contents, understand its implications (and have sought clarification of those sections that were unclear to me) and agree to abide by its provisions. I now acknowledge that I have a full understanding of Kappa Psi's policy and vow to abide by it at all times. Furthermore, I understand that I should consult the Chapter's Risk Management Chair, Province Risk Management Chair, the International Risk Management Committee, or the Executive Committee if I have any future questions regarding this policy.

X _____
Brother's (or Pledge's) Signature

X _____
Chapter Regent's Signature

Date