



NORTHWESTERN
UNIVERSITY

Responsible University Officials: Provost;
Executive Vice President; Vice President for
Student Affairs

Responsible Offices: Office of the Provost;
Office of Human Resources; Office of
Student Affairs

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POLICY ON SEXUAL MISCONDUCT

Policy Statement

Northwestern University prohibits all forms of sexual misconduct, including but not limited to, sexual assault, stalking, dating or domestic violence, and sexual harassment. Such conduct violates the community values and principles of our institution and disrupts the living, learning, and working environment for students, faculty, staff and other community members. In furtherance of this policy, Northwestern University has adopted the following standards of conduct for all members of our community – students, faculty, and staff, as well as University vendors, contractors, visitors, guests, and third parties – with respect to sexual misconduct. These standards apply equally to all regardless of the sex, gender, sexual orientation, gender identity, or gender expression of any of the individuals involved.

Reason for Policy/Purpose

Northwestern University is committed to fostering an environment in which all members of our campus community are safe, secure, and free from sexual misconduct of any form. Our community expects that all interpersonal relationships and interactions – especially those of an intimate nature – will be grounded upon mutual respect, open communication, and clear consent. When learning of conduct or behavior that may not meet these standards, community members are expected take an active role in upholding this policy and promoting the inherent dignity of all individuals.

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Who Approved This Policy

Vice President of Student Affairs
Provost
Executive Vice President for Business and Finance

Who Needs to Know This Policy

All Northwestern University community members, including students, faculty and staff, as well as University vendors, contractors, visitors, guests, volunteers, interns, and third parties.

Jurisdictional Statement

Northwestern University may investigate any alleged violations of this policy that occur in the context of a University program or activity or that otherwise affect the University’s working or learning environments, regardless of whether that conduct occurred on or off campus. In situations where the alleged sexual misconduct occurred outside of the context of a University program or activity or off-campus and the respondent is not a member of the University community, the University will typically not conduct an investigation but may address the situation and provide appropriate resources to those individuals impacted and, where appropriate, the broader University community.

Website Address for This Policy

www.northwestern.edu/sexual-misconduct

Contacts

If you have any questions about this policy, you may contact: Title IX Coordinator and Director of the Office of Sexual Harassment Prevention: (847) 491-3745 or TitleIXCoordinator@northwestern.edu.

Policy

The terms and definitions used here are important components of University policy. The definitions are intended to give meaning to these terms in the context of the Northwestern University community. Criminal and other applicable state laws may use different definitions. Appendix A provides Illinois criminal law terms and definitions.

I. Consent

Consent represents the cornerstone of respectful and healthy intimate relationships. Northwestern University strongly encourages its community members to communicate – openly, honestly, and clearly – about their actions, wishes, and intentions when it comes to sexual behavior, and to do so before engaging in intimate conduct. It is always the requirement of the individual initiating sexual contact (or undertaking a new type of sexual activity) to ensure that consent is present before acting and is present during sexual activity.

When determining whether consent was present, the University will consider whether a sober, reasonable person in the same position should have known whether the other party could or could not consent to the sexual activity.

A. For purposes of this policy, *consent is present when clearly understandable words or actions manifest a knowing, active, voluntary, and present and ongoing agreement to engage in specific sexual or intimate contact.*

Consent must be all of the following:

- *Knowing*: Consent must demonstrate that all individuals understand, are aware of, and agree to the “who” (same partners), “what” (same acts), “where” (same location), “when” (same time), and “how” (the same way and under the same conditions) of the sexual activity. Consent to engage in sexual activity with one person does not constitute consent to engage in sexual activity with another person.
- *Active*: Consent must take the form of “clearly understandable words or actions” that reveal one’s expectations and agreement to engage in specific sexual activity. This means that silence, passivity, submission, or the lack of verbal or physical resistance (including the lack of a “no”) should not – in and of themselves – be understood as consent. Consent cannot be inferred by an individual’s manner of dress, the giving or acceptance of gifts, the extension or acceptance of an invitation to go to a private room or location, or going on a date.
- *Voluntary*: Consent must be freely given and cannot be the result of respondent’s force (violence, physical restraint, or the presence of a weapon), threats (indications of intent to harm, whether direct or indirect), intimidation (extortion, menacing behavior, bullying), coercion (severe or persistent pressure causing fear of significant consequences from respondent if one does not engage in sexual activity) or fraud (misrepresentation or material omission about oneself or the present situation in order to gain permission for sexual or intimate activity).
- *Present and ongoing*: Consent must exist at the time of the sexual activity. Consent to previous sexual activity does not imply consent to later sexual acts; similarly, consent to one type of sexual activity does not imply consent to other sexual acts. Consent may also be

withdrawn at any time – provided the person withdrawing consent makes that known in clearly understandable words or actions.

B. Consent is not present when an individual does not have the capacity to give consent, voluntarily or involuntarily, due to age (generally 17 in Illinois), physical condition, or disability that impairs the individual's ability to give consent. Reasons why one could lack capacity to give consent due to a physical condition include, but are not limited to, consumption of drugs or alcohol (voluntarily or involuntarily) or being in a state of unconsciousness, sleep, or other state in which the person is unaware that sexual activity is occurring.

Signs of incapacitation include when an individual demonstrates that they are unaware of where they are, how they got there, or why or how they became engaged in a sexual interaction. Some indicators of a lack of capacity to give consent due to consumption of drugs or alcohol may include, but are not limited to:

- Lack of full control over physical movements (for example, difficulty walking or standing without stumbling or assistance);
- Lack of awareness of circumstances or surroundings (for example, lack of awareness of where one is, how one got there, who one is with, or how or why one became engaged in sexual interaction);
- Inability to effectively communicate for any reason (for example, slurring speech, difficulty finding words).

A person may appear to be giving consent but may not have the capacity to do so, in which case the apparent consent is not effective. When determining whether consent was present, the University will consider whether a sober, reasonable person in the same position should have known whether the other party could or could not consent to the sexual activity. If there is any doubt as to another person's capacity to give consent, community members should assume that the other person does not have the capacity to give consent. Being intoxicated or impaired by drugs or alcohol does not excuse one from the responsibility to obtain consent. Being intoxicated or impaired by drugs or alcohol is never an excuse to commit sexual misconduct.

II. Prohibited Conduct

Northwestern University prohibits all forms of sexual misconduct. Such conduct violates the community values and principles of our institution and disrupts the living, learning, and working environment for students, faculty, staff and other community members. Therefore, the University prohibits the actions listed below. An attempt to commit an act identified in this policy, as well as assisting or willfully encouraging any such act, is also considered a violation of this policy. An act may violate one or more parts of this policy. Community members may also be held responsible for the misconduct of their visitors and guests.

A. Sexual Assault

1. *Sexual Penetration without Consent (e.g., rape):* Any penetration of the sex organs or anus of another person when consent is not present; any penetration of the mouth of another person with a sex organ when consent is not present; or performing oral sex on another person when consent is not present. This includes penetration or intrusion,

however slight, of the sex organs or anus of another person by an object or any part of the body.

2. *Sexual Contact without Consent (e.g., fondling)*: Knowingly touching or fondling a person's genitals, breasts, thighs, groin, or buttocks, or knowingly touching a person with one's own genitals, breasts, or buttocks, when consent is not present.

This includes contact done directly or indirectly through clothing, bodily fluids, or with an object. It also includes causing or inducing a person, when consent is not present, to similarly touch or fondle oneself or someone else.

3. *Incest*: Sexual intercourse between persons who are related to each other within the degrees wherein marriage is prohibited by the laws of the state¹ in which the incident occurred.
4. *Statutory Rape*: Sexual intercourse with a person who is under the statutory age of consent under the laws of the state² in which the incident occurred.

- B. *Sexual Exploitation***: Taking sexual advantage of another person for the benefit of oneself or a third party when consent is not present.

This includes, but is not limited to, the following actions (including when they are done via electronic means, methods or devices):

- Sexual voyeurism or permitting others to witness or observe the sexual or intimate activity of another person without that person's consent;
- Indecent or lewd exposure or inducing others to expose themselves when consent is not present³;
- Recording any person engaged in sexual or intimate activity in a private space without that person's consent;
- Distributing sexual information, images, or recordings about another person without that person's consent;
- Recruiting, harboring, transporting, providing, or obtaining another person for the purpose of sexual exploitation;
- Inducing incapacitation in another person with the intent to engage in sexual conduct, regardless of whether prohibited sexual conduct actually occurs.

- C. *Stalking***: A course of conduct directed at a specific person that is unwelcome and that would cause a reasonable person to fear for their safety (or the safety of a third party) or suffer substantial emotional distress.

¹ For incidents that occur outside of the U.S. (e.g., study abroad programs), Illinois law will apply in determining a violation of this policy.

² For incidents that occur outside of the U.S. (e.g., study abroad programs), Illinois law will apply in determining a violation of this policy.

³ Breast-feeding a child is not indecent.

Conduct that can amount to stalking may include two or more actions directed at another person, whether done directly, indirectly, through others, via devices, or via any other methods or means (specifically including electronic means), including but not limited to:

- Following a person;
- Being or remaining in close proximity to a person;
- Entering or remaining on or near a person's property, residence, or place of employment;
- Monitoring, observing or conducting surveillance of a person;
- Threatening (directly or indirectly) a person;
- Communicating to or about a person;
- Giving gifts or objects to, or leaving items for, a person;
- Interfering with or damaging a person's property (including pets); or
- Engaging in other unwelcome contact.

D. *Dating/Domestic Violence:* Intimidation, harassment, physical abuse, sexual abuse, or interference with personal liberty of any person by someone in an intimate relationship, as described below. These actions may include, but are not limited to:

- Physical abuse: hitting, slapping, shoving, grabbing, pinching, biting, or hair pulling;
- Psychological or emotional abuse: a pattern of behavior undermining an individual's sense of self-worth or self-esteem, constant criticism, diminishing one's abilities, name-calling, or damaging one's relationship with one's children;
- Sexual abuse: attacks on sexual parts of the body, forcing sex after physical violence, treating one in a sexually demeaning manner, coercing or attempting to coerce any sexual contact or behavior without consent.

Individuals encompassed in the definition of *Dating Violence* include, but are not limited to:

- Persons who have or have had a dating relationship;
- Persons who have or have had a social relationship of a romantic or intimate nature.

Individuals encompassed in *Domestic Violence* include, but are not limited to:

- Current and former spouses;
- Current and former domestic partners;
- Intimate partners or dating partners who share or formerly shared a common dwelling;
- Persons who otherwise have a child in common or share a relationship through a child.

E. *Sexual Harassment:* Sexual harassment is any unwelcome conduct of a sexual nature where: sexual favors are used or threatened to be used as a basis for academic or employment decisions (*quid pro quo* harassment); where the conduct creates a hostile, intimidating or offensive academic or working environment; where the conduct has the effect of unreasonably interfering with an individual's work performance; or where other verbal, nonverbal, or physical conduct of a sexual nature is sufficiently severe, persistent, or pervasive to limit a person's ability to participate in or benefit from an educational program or activity.

Some examples of sexual harassment may include:

- Pressure for a dating, romantic, or intimate relationship;
- Unwelcome sexual advances;

- Unwelcome touching, kissing, hugging, or massaging;
- Pressure for or forced sexual activity;
- Unnecessary references to parts of the body;
- Remarks about a person's gender, nonconformity with gender stereotypes, or sexual orientation;
- Sexual innuendoes or humor;
- Obscene gestures;
- Sexual graffiti, pictures, or posters;
- Sexually explicit profanity;
- Stalking or cyberbullying that is based on gender or sex;
- E-mail, texting (“sexting”) and Internet use that violates this policy;
- Sexual assault or violence.

All forms of sexual misconduct identified in this policy are also prohibited forms of sexual harassment.

III. Reporting Obligation

All University employees (including student employees), as well as non-employees with teaching or supervisory authority, are obligated to promptly report sexual misconduct of which they become aware in the scope of their work for the University to the Title IX Coordinator or Deputy Title IX Coordinator, unless they are a resource listed in Appendix D. The University encourages all individuals to report sexual misconduct.

IV. Retaliation

Northwestern University strictly prohibits retaliation against any member of its community for reporting an incident of sexual misconduct or for participating, in any manner, in an investigation or hearing related to a report of sexual misconduct. The University considers such actions to be protected activities in which all members of the Northwestern community may freely engage.

Retaliation is materially adverse action taken against an individual because they engaged in protected activities, when the adverse action is sufficiently severe or pervasive that it could deter a reasonable person from engaging in the protected activities. Members of the community are prohibited from engaging in actions directly or through others that reasonably could deter a party or a witness from reporting sexual misconduct or participating in an investigation or hearing. Examples of retaliation could include, but are not limited to: terminating someone’s employment; reducing a grade; removing someone from an organization; direct or indirect intimidation, threats, or coercion; or harassment or other forms of discrimination.

The Northwestern community is strongly encouraged to report any alleged incident of retaliation under this policy to the Title IX Coordinator or Deputy Title IX Coordinator, who shall investigate the matter and take appropriate actions to address such conduct. Individuals who are found to have engaged in retaliation are subject to disciplinary action that may include, but is not limited to, the sanctions listed in Procedures Section 6B, up to and including exclusion, expulsion, or dismissal from the University, and termination of employment, including revocation of tenure. Sanctions for retaliation may

be applied regardless of whether there is a finding on the underlying complaint that sexual misconduct has occurred.

V. Amnesty for Sexual Misconduct Complainants and Witnesses

Northwestern University encourages reporting of sexual misconduct and seeks to remove any barriers to making a report. The University recognizes that an individual who has been drinking or using drugs at the time of the incident may be hesitant to make a report because of potential consequences for their own conduct. To encourage reporting, an individual who makes a good faith report of sexual misconduct that was directed at them or another person will *not* be subject to disciplinary action by the University for a conduct or policy violation that is related to and revealed in the sexual misconduct report or investigation, unless the University determines that the violation was serious and/or placed the health or safety of others at risk. The University may, however, initiate an educational discussion or pursue other educational interventions regarding alcohol or other drugs. These interventions do not include involuntary leaves for students from the University. Amnesty does not preclude or prevent action by police or other legal authorities. This Amnesty provision shall also apply to student groups making a report of sexual misconduct.

VI. Free Expression and Academic Freedom

Northwestern University is firmly committed to free expression and academic freedom. We are equally committed to creating and maintaining a safe, healthy, and harassment-free environment for all members of our community. We firmly believe that these two legitimate interests can coexist. Discrimination, harassment, and retaliation against members of the Northwestern community are not protected expression or the proper exercise of academic freedom. The University will consider academic freedom in the investigation of reports of sexual misconduct or retaliation that involve an individual's statements or speech.

VII. Title IX and VAWA Statement

It is the policy of Northwestern University to comply with Title IX of the Education Amendments of 1972, which prohibits discrimination (including sexual harassment and sexual violence) based on sex in the University's educational programs and activities. It is also Northwestern's policy to comply with the federal Violence Against Women Act amendments to the Jeanne Clery Disclosure of Campus Security Policy and Campus Crimes Statistics Act, and the accompanying regulations (collectively referred to as VAWA). Title IX prohibits retaliation for asserting or otherwise participating in claims of sex discrimination. VAWA imposes additional duties on universities and colleges to investigate and respond to reports of sexual assault, stalking, and dating or domestic violence, and to publish policies and procedures related to the way these reports are handled. Northwestern has designated the Title IX Coordinator, with assistance of the Deputy Title IX Coordinators, to coordinate Northwestern's compliance with Title IX and VAWA and to respond to reports of violations. The University has directed its Clery Coordinator to coordinate Northwestern's compliance with the Clery reporting-related VAWA requirements. For more information about Title IX and VAWA, please go to www.northwestern.edu/sexual-misconduct. A person may also file a complaint with the Department of Education's Office for Civil Rights regarding an alleged violation of Title IX by visiting www2.ed.gov/about/offices/list/ocr/complaintintro.html or calling 1-800-421-3481.

Procedures⁴

Information covered in this section includes:

1. **Seeking Medical Assistance**
2. **Preserving Evidence**
3. **Confidential Support, Advocacy & Counseling Services**
4. **Reporting Sexual Misconduct**
5. **Protective Measures**
6. **Investigation & Resolution of Alleged Sexual Misconduct Violations**
7. **Educational Training, Awareness & Prevention Programs**

1. Seeking Medical Assistance

Experiencing any form of sexual misconduct, especially acts of violence, is difficult and overwhelming. Survivors often experience a range of emotions, including fear, anxiety, and confusion, and may be unsure of what they want to, or should do, next. Regardless of whether the individual chooses to report the incident, the University strongly encourages survivors of any form of violence to seek medical attention as soon as possible, even if they feel no injury was sustained. Medical assistance providers can treat visible physical injuries and identify injuries that may not be visible, and, where appropriate, also address concerns regarding sexually transmitted infections and pregnancy, and provide emergency contraception (if requested). In addition, a hospital can test for the presence of alcohol or drugs (e.g., “date rape” drugs) and perform a rape evidence collection procedure (see Procedures Section 2), which are also strongly recommended to maintain all legal options.

Medical services are available from the following resources on or near Evanston and Chicago campuses:

Northwestern University Health Services

Evidence collection kit cannot be provided; CARE staff can be contacted to provide support services, if desired. (See Procedures Section 3 for more information on CARE).

Evanston Campus: 633 Emerson Street, Evanston
Phone: (847) 491-8100 (doctor on call 24 hours)
Website: <http://www.northwestern.edu/healthservice-evanston/>
(for regular hours of operation and 24-hour emergency contact info)

⁴ The Northwestern campus in Qatar has separate procedures and resources. See <http://www.qatar.northwestern.edu/>.

Chicago Campus: 675 North St. Clair Suite 18-200, Chicago
Phone: (312) 695-8134
Website: <http://www.northwestern.edu/healthservice-chicago/medical-services/appointments/index.html>
(for regular hours of operation and 24-hour emergency contact info)

NorthShore University Health System/ Evanston Hospital, Emergency Dept. (24 hours)
Evidence collection kit available; Evanston Police Victim Services advocate can be present to provide support services, if desired.

Location: 2650 Ridge Avenue, Evanston
Phone: (847) 570-2111 (emergency room)
Website: <http://www.northshore.org/locations/our-hospitals/evanston-hospital/>
(for more information or to request an appointment online)

Northwestern Memorial Hospital, Emergency Department (24 hours)
Evidence collection kit available; Advocate from Rape Victim Advocates will be present to provide support services, if desired.

Location: 251 E Erie Street, Chicago
Phone: (312) 926-5188 (emergency room)
Website: <http://www.nmh.org/nm/quality-emergency-department-services>
(for more information)

Presence St. Francis Hospital, Emergency Services (24 hours)
Evidence collection kit available; Evanston Police victim services advocate can be present to provide support services, if desired. Emergency contraception not provided.

Location: 355 Ridge Avenue, Evanston
Phone: (847) 316-4000
Website: http://www.reshealth.jobs/sub_sfh/sfhservices/service_detail.cfm?rhcServiceID=2

Under Illinois law, medical personnel are required to alert police when it reasonably appears that the person requesting treatment has sustained an injury as a victim of a criminal offense, including sexual assault or violence, but individuals have the right to refuse to speak to police.

2. Preserving Evidence

Many sexual misconduct offenses also are crimes in the state or locality in which the incident occurred. For that reason, survivors of sexual misconduct often have legal options that they can pursue. These options are available solely at the discretion of survivors, who may change their minds about pursuing them at any time. For example, a survivor may seek a protective order from a court against the perpetrator(s); pursue a civil action against the perpetrator(s); and/or participate in a law enforcement investigation and criminal prosecution of the perpetrator(s). Regardless of whether an incident of sexual misconduct is reported to the police or the University, Northwestern strongly encourages individuals who have experienced sexual misconduct to preserve evidence to the greatest extent possible, as this will best maintain all legal options for them in the future.

Additionally, such evidence may be helpful in pursuing a complaint with the University. While the University does not conduct forensic tests for parties involved in a complaint of sexual misconduct, the results of such tests that have been conducted by law enforcement agencies and medical assistance providers may be submitted as evidence that may be considered in a University investigation or proceeding, provided they are available at the time of the investigation or proceeding.

Below are suggestions for preserving evidence related to an incident of sexual misconduct. It is important to keep in mind that each suggestion may not apply in every incident:

General evidence preservation suggestions:

- In order to maintain their legal options in the future, individuals should consider not altering, disposing of, or destroying any physical evidence of sexual misconduct.
- If there is suspicion that a drink may have been drugged, an individual should inform a medical assistance provider and/or law enforcement as soon as possible so they can attempt to collect possible evidence (e.g., from the drink, through urine or blood sample).
- Individuals can preserve evidence of electronic communications by saving them and/or by taking screen shots of text messages, instant messages, social networking pages, or other electronic communications, and by keeping pictures, logs, or copies of documents that relate to the incident and/or perpetrator.
- Even if survivors choose not to make a complaint regarding sexual misconduct, they may consider speaking with University Police or other law enforcement to preserve evidence in the event that they change their mind at a later date.

Evidence preservation suggestions specific to sexual assault

- Because some evidence, particularly evidence that may be located on the body, dissipates quickly (within 48-96 hours), individuals who have been sexually assaulted and wish to preserve evidence should go to a hospital or medical facility immediately to seek a medical examination and/or evidence collection. Under Illinois law, any cost for an emergency medical or forensic examination for a victim of sexual violence that is not covered by private insurance or Illinois Public Aid will be covered by the Illinois Department of Healthcare and Family Services, and should not be billed to the patient.
- An individual who has been sexually assaulted and wishes to preserve evidence should, if possible, not shower, bathe, douche, smoke, brush teeth, eat, drink, use the bathroom, or change clothes or bedding before going to the hospital or seeking medical attention.
- If the individual who has been sexually assaulted decides to change clothes or bedding and wishes to preserve evidence, they should not wash the clothes worn or bedding used during the assault, and should bring them to a hospital, medical facility or the police in a non-plastic bag (e.g., paper bag).

- In Illinois, individuals who have been sexually assaulted may allow the collection of evidence even if they choose not to make a report to law enforcement. After the evidence is collected, Illinois law requires hospital staff to store it for two weeks. A sexual assault evidence collection kit may not be released by an Illinois hospital without written consent from the survivor.

3. Confidential Support, Advocacy & Counseling

The following resources are available for individuals to discuss incidents and issues related to sexual misconduct on a confidential basis. Confidential resources will not disclose information about incidents of sexual misconduct to anyone, including law enforcement or the University, except in very limited situations, such as when failure to disclose the information would result in imminent danger to the individual or to others or where state law requires a report be made. Confidential resources can provide survivors with information about support services and their options. Because of the confidential nature of these resources, disclosing information to or seeking advice from a confidential counselor does not constitute a report or complaint to the University and will not result in a response or intervention by the University. A person consulting with a confidential resource may later decide to make a report to the University or law enforcement.

On-Campus Confidential Resources:

<p>CARE: Center for Awareness, Response & Education⁵</p>	<p>Evanston Campus: 633 Emerson Street, 3rd Floor (847) 491-2054 care@northwestern.edu www.northwestern.edu/care</p>	<p>Provides confidential support and advocacy services for students who are survivors of sexual violence, dating/domestic violence, or stalking, as well as friends and supporters of survivors. CARE support services include short-term management of trauma symptoms, safety planning, skill building, and a Trauma Recovery Group. Advocates can provide help requesting academic or housing accommodations from the University or support through a Title IX or police reporting process. CARE can also provide referrals to counseling, legal or medical advocacy, or other resources on and off campus.</p>
<p>Women’s Center Counseling Services</p>	<p>Evanston Campus: 2000 Sheridan Road (847) 491-7360</p> <p>Chicago Campus: Abbott Hall, Suite 1400 710 North Lake Shore Drive (312) 503-3400 womenscenter@northwestern.edu www.northwestern.edu/womenscenter/</p>	<p>Provides counseling services for faculty, students and staff members</p>
<p>CAPS: Counseling and Psychological Services</p>	<p>Evanston Campus: 633 Emerson Street, 2nd Floor (847) 491-2151 (24-hours)</p> <p>Chicago Campus: Abbott Hall, 5th Floor 710 N. Lake Shore Drive (312) 503-0936 (847) 491-2151 (after hours) www.northwestern.edu/counseling/</p>	<p>Provides counseling services to students, also provides a counselor on- call 24 hours a day</p>
<p>Office of the University Chaplain/Office of Religious Life</p>	<p>Evanston Campus: 1870 Sheridan Road (847) 491-7256 (847) 864-7865 (after hours) chaplain@northwestern.edu www.northwestern.edu/religious-life/</p>	<p>Provides spiritual counseling and advice for all members of the University community</p>
<p>Faculty and Staff Assistance Program</p>	<p>(855) 547-1851 (24 hours) http://www.northwestern.edu/hr/work-life/faculty-staff-assistance-program.html du/hr/work- life/nu-life-</p>	<p>Provides confidential crisis intervention and short-term counseling for faculty and staff, as well as their household family members at no cost.</p>

⁵ CARE is a confidential advisor under the Illinois *Preventing Sexual Violence in Higher Education Act*.

Off-Campus Confidential Resources:

<p>Hotlines</p> <p>(not staffed by or affiliated with Northwestern)</p>	<p>Chicago Metro Rape Crisis Hotline (YWCA): (888) 293-2080</p> <p>Chicago Domestic Violence Line: (877) 863-6338</p> <p>Evanston Domestic Violence Line (YWCA): (877) 718-1868</p> <p>RAINN: Rape, Abuse & Incest National Network (800) 656-HOPE https://ohl.rainn.org/online/ (online hotline)</p>	<p>All hotlines provide 24 hour (7 days/week) crisis counseling and information regarding sexual assault, dating violence and stalking. Survivors and friends of survivors can call.</p> <p><i>Note- the hotlines can also provide information on local hospitals, such as what hospitals will have a victim advocate or SANE (Sexual Assault Nurse Examiner) available.</i></p>
<p>Center on Halsted (LGBTQ Services)</p>	<p>3656 N. Halsted St, Chicago LGTBQ Violence Resource Line: 773-871-2273 http://www.centeronhalsted.org/</p>	<p>Services include: Counseling services; connecting individuals with professional help, law enforcement, agencies, services, and other providers.</p>
<p>Rape Victim Advocates</p>	<p>Main Office: 180 N. Michigan Ave, Suite 600, Chicago (312) 443-9603 www.rapevictimadvocates.org</p>	<p>Services include: medical and legal advocacy, counseling services (individual and group). Services are free and for survivors or friends/partners of survivors.</p>
<p>YWCA-Evanston</p>	<p>1215 Church St, Evanston (847) 864-8445 www.ywca.or/evanston</p>	<p>Services include: Counseling and support for survivors of dating/domestic violence, legal advocacy and residential services (emergency shelter)</p>
<p>Evanston Victim Services Program</p>	<p>Evanston Police Department 1454 Elmwood Avenue, Evanston http://www.cityofevanston.org/police/about-us/police-social-services/</p>	<p>Services include: crisis intervention for survivors of sexual violence and/or dating/domestic violence, medical and legal/court advocacy</p>
<p>Life Span Center for Legal Services and Advocacy</p>	<p>70 E. Lake Street, Suite 700, Chicago (312) 408-1210 life-span@life-span.org www.life-span.org</p>	<p>Services include (for survivors of DV and SV and stalking): legal services, legal advocacy (i.e. assistance with Orders of Protection, etc.) and counseling</p>
<p>Center for Contextual Change</p>	<p>9239 Gross Point Road, Skokie (847) 676-4447 x304 (for appointments or a confidential assessment) www.centerforcontextualchange.org</p>	<p>Services for survivors of sexual and domestic/dating violence: individual and group counseling.</p> <p>Services for perpetrators of sexual and domestic/dating violence: individual and group counseling</p>
<p>Porchlight Counseling Services</p>	<p>(773) 750-7077 confidential helpline and intake www.porchlightcounselingservices.org</p>	<p>Services include: free counseling for survivors of sexual and/or domestic/dating violence</p>
<p>KAN-WIN</p>	<p>2434 E. Dempster St. Suite 111, Des Plaines 773-583-1392 www.kanwin.org</p>	<p>Services include: (multi-lingual) Free counseling, legal advocacy (assistance with protective orders/ court accompaniment) and immigration protection for Asian-American or Asian immigrant survivors of sexual and/or domestic violence.</p>

4. Reporting Sexual Misconduct

While the University strongly encourages reporting, members of the University community who believe they have experienced sexual misconduct have the right to choose whether or not to report the incident to the University or law enforcement and pursue a sexual misconduct complaint with the University. The information below provides information for individuals who wish to report incidents of sexual misconduct.

A. Reporting to Law Enforcement

Northwestern University encourages individuals to report incidents of sexual misconduct to University Police or local law enforcement officials. Timely reporting to the police is an important factor in successful investigation and prosecution of crimes, including sexual violence crimes, and may lead to the arrest of an offender or aid in the investigation of other incidents.

An individual who has experienced sexual misconduct has the right to choose whether to file a police report. Filing a police report can result in the investigation of whether sexual violence or related crimes occurred and the prosecution of those crimes against a perpetrator. It is important to know that reporting the incident to police or University Police does not mean an individual is obligated to testify in court.

The Northwestern University Police Department has officers who are specially trained to work with individuals reporting sexual violence. Further, University Police has a written guarantee for sexual violence survivors that reflects its primary concern for survivors and emphasizes sensitivity and privacy. (Available at: <http://www.northwestern.edu/up/crime/awareness/sexual-violence.html>). University Police can also assist in reviewing options with survivors and identifying and facilitating support resources related to:

- Seeking medical attention;
- Seeking support, advocacy and counseling services;
- Discussing legal options, including seeking protective orders from a court;
- Options under the University's sexual misconduct investigation process.

Reports of sexual misconduct made to University Police will automatically be reported to the Title IX Coordinator or Deputy Title IX Coordinator regardless of whether the individual who experienced the sexual misconduct chooses to pursue criminal charges.

Northwestern University Police Department

Evanston Campus: 1201 Davis Street, Evanston
Phone: (847) 491-3456 (24 hours)

Chicago Campus: 211 East Superior Street, Chicago
Phone: (312) 503-3456 (24 hours)
Website: <http://www.northwestern.edu/up/>

Evanston Police Department

Evanston Campus: 1454 Elmwood Avenue, Evanston

Phone: 911 or (847) 866-5000 (24 hours)

Website: www.cityofevanston.org/police/

Chicago Police Department – 18th District (covers Chicago campus)

Chicago Campus: 1160 North Larrabee Ave., Chicago

Phone: 911 or (312) 744-4000 (24 hours)

Website: www.chicagopolice.org/

B. Reporting Incidents to the University

An individual who has experienced sexual misconduct has the right to choose whether to report the incident to the Office of Sexual Harassment Prevention. As stated in Policy Section III, all University employees (including student employees) are obligated to promptly report incidents of sexual misconduct of which they become aware during the scope of their work for the University, unless they are a resource listed in Appendix D. Further, students, bystanders, and third parties who have observed or been made aware of sexual misconduct may report the incident to the Office of Sexual Harassment Prevention. Northwestern provides the option for making reports in-person, by email, regular mail, or phone, and electronically.

While anonymous reports will be reviewed by the Title IX Coordinator, the University's ability to address alleged misconduct reported by anonymous sources is significantly limited.

To speak to someone confidentially without making a report, please see the Confidential Resources listed in Section 3 above.

The staff identified below are specially trained to work with individuals who report sexual misconduct and have knowledge about on- and off-campus resources, services, and options – including the availability of protective measures discussed in Procedures Section 5. The University has generally designated the Title IX Coordinator to oversee complaints of sexual misconduct involving staff, faculty, and third parties, and the Deputy Title IX Coordinator for Students to oversee complaints of sexual misconduct involving students.

Title IX Coordinator and Director of the Office of Sexual Harassment Prevention

Contact: Joan Slavin, Title IX Coordinator;
Director, Office of Sexual Harassment Prevention

Location: 633 Clark Street, Room 2-636, Evanston

Phone: (847) 491-3745

Email: j-slavin@northwestern.edu or TitleIXCoordinator@northwestern.edu

Website: www.northwestern.edu/sexual-misconduct

Deputy Title IX Coordinator for Students

TBD

To File a Report Electronically

Individuals may use the form at the following link to electronically file a report of sexual misconduct with the Office of Sexual Harassment Prevention:

[Bit.ly/NUReportSexualMisconduct](https://bit.ly/NUReportSexualMisconduct)

Individuals may also file a report electronically by email to: TitleIXReport@northwestern.edu.

An immediate auto-response email with information about resources and options will be sent in response to reports filed electronically.

Other University Reporting Options

EthicsPoint

(Third party service for reporting complaints, including anonymous complaints, by phone or online)

Phone: (866) 294-3545

Website: www.northwestern.edu/ethics/

C. Reporting Incidents Involving Minors

As stated in the University's ***Policy on Reporting Suspected Abuse and Neglect Related to Minors***, it is the University's Policy that all University community members are obligated to report to DCFS and University Police any suspected abuse and neglect of a child. This includes any and all incidents of sexual misconduct involving minors. (Policy available at http://policies.northwestern.edu/docs/Reporting_Child_Abuse_and_Neglect.pdf). Further, it is a crime in Illinois to fail to report sexual abuse of a child of which someone over the age of 18 has personally observed.

5. Protective Measures

Protective measures are reasonable measures the University can put in place for an individual who reports having experienced sexual misconduct or retaliation. Protective measures can provide immediate support and help protect the individual's safety and ability to access their education and employment, at no cost to that individual. These measures can be temporary in duration pending the results of an investigation, but can become permanent. Protective measures include, but are not limited to:

- A no-contact directive issued by the Title IX Coordinator, Deputy Title IX Coordinator, or their designee;
- Housing or work space relocation;
- Changes to dining situation;
- Adjustment of course schedules or other changes to an individual's academic situation;
- Changes to work schedules or other changes to an individual's employment situation;
- Time off from class or work, or a leave of absence;
- Transportation arrangements;
- Safety planning;
- Honoring an order of protection entered by a court.

Protective measures are available regardless of whether an individual chooses to report an incident to University police or local law enforcement or pursue a complaint with the University. The Title IX Coordinator, Deputy Title IX Coordinator, or their designee will determine whether protective measures are reasonable and should be implemented, and, if so, will work to ensure that protective measures are implemented as soon as possible.

The University will keep confidential any protective measures provided, to the extent that maintaining such confidentiality would not impair the ability of the institution to provide the protective measures.

To seek a protective measure:

Students should contact:

Deputy Title IX Coordinator for Students: **TBD**

or

The Center for Awareness, Response and Education (CARE)

Location: 633 Emerson Street, Third Floor, Evanston

Phone: (847) 491-2054

Email: care@northwestern.edu

Website: www.northwestern.edu/care

Staff and faculty should contact:

Joan Slavin, Title IX Coordinator

Location: 633 Clark Street, #2-636, Evanston

Phone: (847) 491-3745

Email: j-slavin@northwestern.edu or TitleIXCoordinator@northwestern.edu

Website: www.northwestern.edu/sexual-misconduct

Violations of directives related to protective measures may lead to an investigation and disciplinary action which may include, but is not limited to, the sanctions listed in Procedures Section 6B, including exclusion, expulsion, or dismissal from the University, and termination of employment, including revocation of tenure.

6. Investigation and Resolution of Alleged Violations of the Sexual Misconduct Policy

Reporting an incident of sexual misconduct or retaliation to the University can result in the investigation of whether a violation of this policy occurred and can also result in disciplinary action against any student, staff or faculty member, or outside party, who is determined to have violated this policy. The University has generally designated the Office of Sexual Harassment Prevention to receive and oversee complaints of sexual misconduct and retaliation. Upon receiving a report of sexual assault, stalking, or dating or domestic violence, the Office will provide the complainant with information about their rights and options.

The University's resolution process for reports of violations of this policy will be prompt, fair, and impartial. The resolution process is intended to afford a prompt response to reports of sexual misconduct, to maintain privacy and fairness consistent with applicable legal requirements, and to impose appropriate sanctions on violators of this policy. The resolution process for complaints of sexual misconduct is set forth in detail in Appendix C.

Because allegations of violations of this policy can sometimes raise challenging new issues and involve competing interests, the University reserves discretion to take reasonable actions to address those issues in a manner consistent with the spirit of this policy, and which preserves fairness for both parties and maintains the integrity in the investigation and resolution processes.

There is no time limit for when an incident of sexual misconduct may be reported; however, in most cases, the University will not investigate reports of incidents that occurred over one year prior to the time the investigation is requested. The Title IX Coordinator reserves the right to conduct an initial inquiry, investigate, or otherwise address any report, regardless of the time it is made, based on concern for the safety or well-being of the University community. All reports should be made as soon as possible after the incident because the passing of time makes a review of the evidence more difficult and the memories of involved parties become less reliable.

If, based on an initial inquiry into the report, the Title IX Coordinator determines that insufficient information exists to move forward or that the alleged misconduct, even if substantiated, would not be a violation of the policy, the Office may close the case unless the Title IX Coordinator determines that the interests of the community warrant further action on the report by the Office or the University.

A. Standard of review

The University uses the preponderance of the evidence standard to determine responsibility of violations of this policy.

B. Sanctions, corrective actions, and remedies

Violations of this policy may result in sanctions and corrective actions, which can include, but are not limited to:

- *Verbal warning*
- *Written warning*
- *Advisory Letter*
- *Monitoring*
- *Disciplinary hold on academic and/or financial records*
- *Performance improvement/management process*
- *Required counseling or therapy*
- *Required training or education*
- *Campus access restrictions*
- *No trespass order issued by NUPD (with respect to campus locations)*
- *No contact directive (with respect to an individual)*
- *Loss of privileges*
- *Loss of oversight, teaching or supervisory responsibility*
- *Probation*
- *Demotion*
- *Loss of pay increase*
- *Transfer (employment)*
- *Revocation of offer (employment or admissions)*
- *Disciplinary suspension*
- *Suspension with pay*
- *Suspension without pay*
- *Exclusion*
- *Expulsion*
- *Degree revocation*
- *Termination of employment*
- *Revocation of tenure*
- *Termination of contract (for contractors)*

The University may assign other sanctions as appropriate in each particular situation.

Sanctions and corrective actions will be imposed in accordance with relevant policies and/or procedures and other requirements set forth in the applicable Staff Handbook, Faculty Handbook,

Student Handbook, other policies or handbooks that may be developed over time, or contracts. In addition, the University may take steps to remediate the effects of a violation on victims and others.

Following an investigation, the University may extend protective measures, and/or take other measures to eliminate any hostile environment caused by the sexual misconduct, prevent the recurrence of any sexual misconduct, and remedy the effects of the sexual misconduct on the complainant and the University community. Such measures may include, but are not limited to, the protective measures referenced in Procedures Section 5, as well as counseling, training, and other preventative measures.

C. Advisor/legal counsel

Complainants and respondents may be accompanied by one advisor throughout the investigation and any hearing process. An advisor is a support person who is present to provide support to a complainant or respondent throughout an investigation and/or hearing. An advisor may not speak, write, or otherwise communicate with an investigator, hearing officer or panel on behalf of the complainant or respondent. Advisors who do not abide by these guidelines may be excluded from the process.

In any matter involving a complaint of sexual assault, stalking, or dating or domestic violence, the advisor may be any person of the party's choosing, including an attorney. However, an advisor may not also serve as a witness in the same matter. Further, the advisor is still limited to the supportive and not participatory role described above. In all other matters, advisors cannot be a witness or party in the matter or a related matter, a family member of the complainant or respondent, or an attorney. A union representative may serve as an advisor, where applicable.

D. Privacy and Sharing of Information

The University considers complaints and investigations conducted under this Policy to be private matters for the parties involved. For that reason, the University will protect the identity of persons involved in reports of sexual misconduct to the best of its ability. The University will only share personally identifiable information with persons with a need-to-know, in order for the University to investigate and respond or to deliver resources or support services. The University does not publish the names nor post identifiable information about persons involved in a report of sexual misconduct in the University Police Daily Crime Log (Blotter) or elsewhere online. The University does not confirm to outside parties the identity of an individual who may be involved in a report of sexual misconduct without that individual's consent. However, the University cannot promise complete confidentiality or privacy in the handling of sexual misconduct reports or complaints.

Most situations require the disclosure of the complainant's identity to those involved in the investigation in order to fully investigate the matter and/or to enable the respondent to fully respond to the allegations. When individuals report allegations of sexual misconduct to the University and do not consent to the disclosure of their names and/or do not disclose the identity of the alleged offenders or identifiable information about the alleged offenders, the University's ability to respond to the complaints may be limited. In cases where an individual reporting sexual misconduct requests anonymity or does not wish to proceed with an investigation, the University, will attempt to honor that request but, in some cases, the Title IX Coordinator or Deputy Title IX Coordinator may determine that the University needs to proceed with an investigation based on concern for the safety

or well-being of the broader University community (e.g., risk of future acts of sexual violence or a pattern of sexual misconduct). Northwestern reserves the right to take appropriate action in such circumstances, including in cases when the individual reporting the misconduct is reluctant to proceed.

All participants in an investigation of sexual misconduct will be informed that confidentiality helps enhance the integrity of the investigation, protect the privacy interests of the parties, and protect the participants from statements that might be interpreted to be retaliatory or defamatory. For these reasons, the complainant and respondent will be asked at the beginning of an investigation to keep the information related to the investigation private, to the extent consistent with applicable law. Witnesses and advisors will be asked to maintain complete confidentiality as to the investigation, to the extent consistent with applicable law.

Upon the conclusion of an investigation, the complainant and respondent will be notified in writing, at the same time, of the outcome of the investigation, including whether the alleged conduct was found to have occurred, and any sanctions imposed on the respondent that directly relate to the complainant. For the same reasons noted above, the University encourages the parties to maintain the confidentiality of this communication.

7. Educational Training, Awareness and Prevention Programs

The University offers a variety of training, awareness, and prevention programs to help prevent sexual misconduct within the Northwestern community. The University strives to ensure that such programming is developed to be culturally relevant; inclusive of diverse communities and identities; sustainable; responsive to community needs; is informed by research or assessed for value, effectiveness, or outcome; and considers environmental risk and protective factors as they occur on the individual, relationship, institutional, community, and societal levels. Additionally, the University provides annual training to investigators, and hearing panel members are trained on issues related to sexual misconduct, investigation, and resolution. For information on educational training, awareness, and prevention programs offered each year, see the Appendices to each campus' annual security report, posted at: <http://www.northwestern.edu/up/safety/annual-report/>.

Forms/Instructions

N/A

Related Information

N/A

History/Revision Dates

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Last Amended Date: September 2016

Appendices

Appendix A: Resource of Relevant Terms and Definitions in Illinois

Appendix B: Pamphlet: “You Have Options. We Can Help: Northwestern University Resource Guide on Sexual Misconduct and Title IX”

Appendix C: Sexual Misconduct Complaint Resolution Process

Appendix D: Resources Not Subject to Mandatory Reporting

APPENDIX A

Resource of Relevant Terms and Definitions in Illinois

Because some of the offenses in this Policy are also crimes under State law, the University provides this summary of relevant Illinois terms and definitions as a resource. Community members who are involved in legal action related to a sexual crime or offense under Illinois law should consider speaking with an attorney for specific information about relevant State law and legal advice.

Consent: Under Illinois law, consent is defined as “a freely given agreement to the act of sexual penetration or sexual conduct in question. Lack of verbal or physical resistance or submission by the victim resulting from the use of force or threat of force by the accused shall not constitute consent. The manner of dress of the victim at the time of the offense shall not constitute consent.” 720 ILCS § 5/11-1.70. The law continues by stating that “[a] person who initially consents to sexual penetration or sexual conduct is not deemed to have consented to any sexual penetration or sexual conduct that occurs after he or she withdraws consent during the course of that sexual penetration or sexual conduct.” *See:* 720 ILCS § 5/11-1.70.

Domestic Violence: The complete Illinois Domestic Violence Act can be found at 750 ILCS § 60/101, *et seq.* Under that law, “domestic violence” is defined as “physical abuse, harassment, intimidation of a dependent, interference with personal liberty or willful deprivation but does not include reasonable direction of a minor child by a parent or person in loco parentis.” 750 ILCS § 60/103. Prohibited domestic violence directed at a “family or household member” includes “spouses, former spouses, parents, children, stepchildren and other persons related by blood or by present or prior marriage, persons who share or formerly shared a common dwelling, persons who have or allegedly have a child in common, persons who share or allegedly share a blood relationship through a child, persons who have or have had a dating or engagement relationship, persons with disabilities and their personal assistants, and caregivers as defined in Section 12-4.4a of the Criminal Code of 2012. For purposes of this paragraph, neither a casual acquaintanceship nor ordinary fraternization between 2 individuals in business or social contexts shall be deemed to constitute a dating relationship.” *See:* 750 ILCS § 60/103.

Dating Violence: In Illinois, the Illinois Domestic Violence Act prohibits “physical abuse, harassment, ... interference with personal liberty or willful deprivation” directed toward “persons who have or have had a dating or engagement relationship.” 750 ILCS § 60/103. “[N]either a casual acquaintanceship nor ordinary fraternization between 2 individuals in business or social contexts shall be deemed to constitute a dating relationship.” *See:* 750 ILCS § 60/103.

Criminal Sexual Assault: In Illinois, a person commits “criminal sexual assault” if “that person commits an act of sexual penetration and: (1) uses force or threat of force; (2) knows that the victim is unable to understand the nature of the act or is unable to give knowing consent; (3) is a family member of the victim, and the victim is under 18 years of age; or (4) is 17 years of age or over and holds a position of trust, authority, or supervision in relations to the victim, and the victim is at least 13 years

of age but under 18 years of age.” 720 ILCS § 5/11-1.20.⁴

Criminal Sexual Abuse: Under Illinois law, a person commits “criminal sexual abuse” by sexual touching (short of penetration) by force or threat of force, or knowing that the victim is unable to consent to or understand the act. A person also commits sexual abuse by engaging in any sexual activity (including sexual penetration): (A) with a person over the age of nine, but under 17 years old, when the defendant is under the age of 17, or (B) with a person over the age of 13, but under 17 years old, when the defendant is at least five years older. *See:* 720 ILCS § 5/11-1.50.

Aggravated Criminal Sexual Assault and Sexual Abuse: Sexual assault and sexual abuse may be punished more severely in Illinois if (A) the defendant: uses, threatens, displays, or is armed with a weapon; causes bodily harm or injury; endangers or threatens the victim’s or someone else’s life; gives the victim a controlled substance without the victim’s consent; or (B) the crime is committed during the course of another felony; or (C) the victim is over 60 years old, physically handicapped, or severely mentally disabled. Depending on the age of the defendant and the victim, the relationship between the victim and the defendant, and whether the defendant uses forces, sexual abuse and sexual assault may also be aggravated if the victim is a child under the age of 18. *See:* 720 ILCS 5/11-1.30, 720 ILCS 5/11-1.60.

Stalking: In Illinois, a person commits the criminal offense of “stalking” when “he or she knowingly engages in a course of conduct directed at a specific person, and he or she knows or should know that this course of conduct would cause a reasonable person to: (1) fear for his or her safety or the safety of a third person; or (2) suffer other emotional distress.” 720 ILCS § 5/12-7.3(a).⁵

⁴ Please also see the Illinois Abused and Neglected Child Reporting Act at 325 ILCS § 5/1, et seq.; criminal sexual abuse at 720 ILCS § 5/11-1.50; aggravated criminal sexual assault at 720 ILCS § 5/11-1.30; and aggravated criminal sexual abuse at 720 ILCS § 5/11-1.60.

⁵ The terms “stalking” is further defined in subsections 720 ILCS § 5/12-7.3(a-3) and (a-5); the definition for “aggravated stalking” can be found at 720 ILCS § 5/12-7.4; and the definition of “cyberstalking” can be found at 720 ILCS § 5/12-7.5.

APPENDIX B

“You Have Options. We Can Help: Northwestern University Resource Guide on Sexual Misconduct and Title IX” is available online at: <http://www.northwestern.edu/sexual-misconduct/docs/TitleIXResourceGuide.pdf>.

Print copies are available by contacting the Office of Sexual Harassment Prevention at 847-467-6165 or TitleIXCoordinator@northwestern.edu.

APPENDIX C

Northwestern University's Sexual Misconduct Complaint Resolution Process can be found at:

<http://www.northwestern.edu/sexual-misconduct/title-IX/complaint-resolution-process.html>

APPENDIX D

Resources Not Subject to Reporting Obligation

The University recognizes that students, staff, and faculty may want to speak confidentially with someone at the University about sexual misconduct without the information disclosed being reported to the Title IX Coordinator. Northwestern has designated the following staff, faculty, and paid student employee roles as resources that are not obligated to report disclosures or information about sexual misconduct to the Title IX Coordinator that they learn in the scope of their University work.

- All staff in the Center for Awareness, Response and Education (CARE)
- All staff in Counseling and Psychological Services (CAPS)
- All staff in University Health Services (including all staff in the Office of Health Promotion and Wellness, team athletic trainers, and team physicians)⁶
- All staff in the Women's Center
- All staff in the Office of Religious Life
- Emeritus Faculty who have been appointed Ombudsmen in the Faculty Ombudsman Program
- Paid student employees or grad interns at any of the above offices (for information learned in the course of their work for these offices).

Note: Some staff and faculty may have a confidentiality privilege associated with some aspect of their work for the University (e.g. physicians), but are subject to the University's reporting obligation for information learned in connection with their work for the University **outside** of a confidential relationship. For example, physicians may have a confidentiality privilege with respect to information shared with them by patients, but they remain obligated to report sexual misconduct of which they become aware of in work not related to patient care, such as work in labs or classrooms or student advising.

⁶ Health Services staff are not obligated to report suspected sexual violence to the Title IX Coordinator. However, under Illinois law, medical personnel are required to alert police when it reasonably appears that a person requesting treatment may have sustained an injury as a victim of sexual violence. In some cases, police may then notify the University about the situation.